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October 30, 2012

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES
#20 OF OCTOBER 30, 2012

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Agenda No. 13
11/21/11

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Sachi A. Hamai
SACHI A. HAMAI
EXECUTIVE OFFICER

**Re: PROJECT NUMBER TR068400-(5)
CONDITIONAL USE PERMIT NO. 2007-00073-(5)
MOBILEHOME PERMIT NO. 2010-00003-(5)
PARKING PERMIT NO. 2008-00002-(5)
HOUSING PERMIT NO. 2010-00001-(5)**

Dear Supervisors:

Your Board previously conducted a public hearing regarding the above-referenced permits, which relate to a proposed residential development involving the closure of a 228-unit mobilehome park and the construction of 318 residential condominium units, with a set-aside of 75 senior housing units, and other site amenities and facilities on a property located at 4241 East Live Oak Avenue, in the unincorporated community of South Monrovia Islands.

At the conclusion of the hearing, you indicated an intent to approve the permits and instructed our office to prepare findings and conditions for your approval. Enclosed are finding and conditions for your consideration.

Very truly yours,

JOHN F. KRATTLI
County Counsel

By

Joseph M. Nicchitta
JOSEPH M. NICCHITTA
Senior Associate County Counsel

APPROVED AND RELEASED:

Richard D. Weiss
RICHARD D. WEISS
Chief Deputy

JMN:ph
Enclosures

HOA.900540.1

**FINDINGS OF THE BOARD OF SUPERVISORS
AND ORDER
PROJECT NUMBER TR068400-(5)
CONDITIONAL USE PERMIT NUMBER 2007-00073-(5)
MOBILEHOME PERMIT NUMBER 2010-00003-(5)
PARKING PERMIT NUMBER 2008-00002-(5)
HOUSING PERMIT NUMBER 2010-00001-(5)**

1. The Los Angeles County ("County") Board of Supervisors ("Board") conducted a duly-noticed public hearing on November 22, 2011, in the matter of Project No. TR068400-(5), consisting of Conditional Use Permit No. 2007-00073-(5) ("CUP"), Mobilehome Permit No. 2010-00003-(5) ("Mobilehome Permit"), Parking Permit No. 2008-00002-(5) ("Parking Permit"), and Housing Permit No. 2010-00001-(5). (The CUP, Mobilehome Permit, Parking Permit, and Housing Permit are referred to collectively as the "Project Permits.") The Project Permits were heard concurrently with Vesting Tentative Tract Map No. 068400-(5) ("Vesting Map"), General Plan Amendment No. 2007-00002-(5) ("Plan Amendment"), and Zone Change No. 2007-00004-(5) ("Zone Change"). The County Regional Planning Commission ("Commission") previously conducted a duly-noticed public hearing on the Project Permits, Vesting Map, Plan Amendment, and Zone Change on October 20, 2010.
2. The permittee, Prime Enterprises, LLC, requests the Project Permits to authorize the closure of a 228-unit mobilehome park known as Santa Anita Village ("Mobilehome Park") and the construction of 318 residential condominium units and other site amenities and facilities on a property located at 4241 East Live Oak Avenue, in the unincorporated community of South Monrovia Islands ("Project").
3. The CUP is a request to: (a) authorize on-site grading in excess of 100,000 cubic yards; and (b) ensure consistency with the Development Program (-DP) overlay zoning on the site. The CUP will restrict development to the Project shown on the approved site plan marked Exhibit "A," and will ensure that no other development will be permitted on the site unless a conditional use permit is first obtained. The CUP will also ensure the Project's compliance with the development standards of the R-3 zone, subject to the following modifications to such standards:

Building Setbacks

While premises in the R-3 zone ordinarily are subject to a front and rear-yard setback of not less than 15 feet and a side-yard setback of not less than five feet pursuant to section 22.20.320 of the County Code, these standards are modified for the Project, to allow:

- A. Lot No. 1: A rear-yard setback of 10 feet for Building No. 10.

- B. Lot No. 2: A side-yard setback of one foot for Building No. 17, and a rear-yard setback of three feet for Building No. 11 and two feet for Building No. 17.
- C. Lot No. 3: A rear-yard setback of zero feet for Building No. 3 and two feet for Building No. 6.
- D. Lot No. 4: A rear-yard setback of two feet for Building No. 2.
- E. Lot No. 5: A rear-yard setback of four feet for Building No. 15.
- F. Lot No. 6: A side-yard setback of three feet and a rear-yard setback of six feet for Building Nos. 24 and 25.

Building Height

While buildings in the R-3 zone ordinarily shall not exceed 35 feet in height above grade, except for chimneys and rooftop antennas, pursuant to section 22.20.300 of the County Code, this standard is modified for the Project, to allow:

- A. Building Nos. 1 through 7, 10, 16, 18, and 19 through 23: A maximum height of 36 feet and 9 inches.
- B. Building Nos. 8, 9, 11 through 15, and 17: A maximum height of 37 feet.
- C. Building No. 24: A maximum height of 66 feet and 4 inches.
- D. Building No. 25: A maximum height of 64 feet and 8 inches.

Walls and Fences

While the height of walls and fences in the R-3 zone ordinarily shall not exceed three and one-half feet within a required front-yard and six feet within a required side or rear-yard pursuant to section 22.48.160 of the County Code, these standards are modified for the Project, to allow:

- A. Lot No. 2: A wall/fence height up to eight feet within the required front-yard setback.
- B. Lot Nos. 2, 3, 4, 5, and 6: A wall/fence height up to eight feet within the required side-yard setbacks.
- C. Lot Nos. 1 and 6: A wall/fence height up to eight feet within the required rear-yard setbacks.
- D. Lot Nos. 1, 3, 4, and 6: A wall/fence height up to six feet within the required front-yard setback.

4. The Vesting Map is a related request to create six multi-family lots on the Project site for the development of 318 residential condominium units in 25 buildings.
5. The Mobilehome Permit is a request to authorize the closure of the Mobilehome Park by adopting the mobilehome park closure impact report ("Closure Impact Report") pursuant to section 66427.4 of the California Government Code and section 8.57.300 of the Los Angeles County Code ("County Code").
6. The Parking Permit is a request to authorize shared and reciprocal parking among six multi-family residential lots to be developed on the site.
7. The Housing Permit is a request to authorize a density bonus for the Project based on the permittee's set-aside of 75 units for senior housing on the site. Although the permittee proposed, and the Commission approved, a density bonus of 68 units, at the Board's public hearing on the project the Board adopted changes to the site's zoning designation under the Countywide General Plan, which resulted in the permittee needing a density bonus of only 52 units to accommodate the Project's proposed 318 units.
8. The Plan Amendment is a related request to amend the Los Angeles Countywide General Plan ("General Plan") Land Use Policy Map ("Land Use Policy Map") by amending the site's land use designation from Category 1 (Low-Density Residential) to Category 3 (Medium-Density Residential).
9. The Zone Change is a related request to amend the site's zoning from Zone C-3 (Unlimited Commercial), Zone R-3-P (Combined Limited Multiple Residence and Parking), and Zone R-A (Residential Agricultural), to Zone R-3-24U-DP (Limited Multiple Residence – 24 Dwelling Units Per Net Acre – DP). The –DP overlay zone will ensure that development occurring after rezoning will conform to the approved plans and be compatible with the surrounding area.
10. The approval of the Project Permits and Vesting Map will not become effective unless and until the Board has approved the Plan Amendment and Zone Change, and both have become effective.
11. The site is 12.1 gross acres (11.4 net acres) in size, is located in the South Arcadia Zoned District, at the northwest corner of the intersection of Live Oak Avenue and Mayflower Avenue, and is currently zoned C-3, R-3-P, and R-A on different portions of the site.
12. The site is irregularly shaped with gently-sloping topography and is developed with an existing 228-unit Mobilehome Park. Thirty-seven of the Mobilehome Park units are currently occupied.
13. The site is currently depicted within the Category 1 land use category of the Land Use Policy Map.

14. Surrounding zoning within a 500-foot radius includes:
- North: R-A;
South: R-3-P, C-3, and A-1 (Light Agricultural);
East: R-A and C-3; and
West: R-A.
15. Surrounding land uses within a 500-foot radius include:
- North: Single-family residences;
South: Single-family residences, office, retail, light industrial, parking, and auto repair uses;
East: Single-family residences and a mobilehome park; and
West: Single-family residences.
16. The site currently consists of one legal lot which contains the existing Mobilehome Park.
17. The site plan for the Project depicts a subdivision containing six multi-family lots with a total of 318 residential condominium units, comprised of 170 townhouse units in 23 buildings, 75 units and 73 units, respectively, in two four-story condominium towers, a community center, a clubhouse, a pool, a playground, and village green. Nineteen of the townhouse buildings, each containing seven to eight townhouse units, are located along the eastern, northern, and western perimeters of the site. Three townhouse buildings, each containing eight units, and one townhouse building, containing 10 units, are located at the center of the site, along with the clubhouse building, an outdoor pool and spa, a playground, village green, guest parking, and parking for disabled persons, all for common use by residents and guests. Each of the townhouse buildings will contain a two-car garage for each townhouse unit located in the building. The two four-story condominium towers are located on the southern portion of the site, along with subterranean parking, a community center, and three outdoor courtyards for common use by residents and guests. A network of private driveways/fire lanes throughout the Project site will afford residents and guests access to and from parking areas, site amenities, and condominium and townhouse residences.
18. The Project will contain a total of 75 market rate condominium units set-aside for seniors aged 55 years and older. All 75 senior units will be contained within the 75-unit condominium tower located on the southern portion of the site. The senior condominium tower will be constructed in the same manner and quality as the other condominium tower in terms of architecture, landscaping, and amenities.
19. The site is accessible via Live Oak Avenue to the south and Mayflower Avenue to the east. Primary access to the site will be via an entrance/exit on Mayflower Avenue. Secondary access to the site will be via an entrance/exit on Live Oak Avenue.

20. The Project will provide a total of 746 parking spaces, 638 of which will be reserved for residents and 108 of which will be reserved for guests. Of the 746 total parking spaces, 12 spaces will be designated for disabled persons. Individual two-car garages for each of the 170 townhouse units will provide 340 spaces reserved for residents. A subterranean parking structure on the southern portion of the site will provide a total of 335 parking spaces, 298 of which will be reserved for residents and 37 of which will be reserved for guests. Of the 335 total parking spaces provided in the subterranean garage, 8 spaces will be designated for disabled persons. Uncovered surface parking spaces along the private driveways and fire lanes adjacent to residences and other site amenities and facilities will provide a total of 71 parking spaces reserved for guests, 4 of which will be designated for disabled persons.
21. Internal circulation and access for the Project will be provided by a private driveway and fire lane system with paved widths varying from 26 to 33 feet. This system includes both parallel and front-loaded guest parking spaces dispersed throughout the site, as well as a network of sidewalks offering pedestrian connectivity throughout the site and to Live Oak Avenue and Mayflower Avenue. The site perimeter will be landscaped to screen the Project from adjacent properties, and landscaping within the site will be provided along the driveways and sidewalks to provide shade within the site and to enhance the aesthetics of the Project.
22. Between October 2007 and October 2008, prior to the Commission's public hearing on the Project, the permittee conducted community outreach to adjacent cities and nearby residents regarding the Project. In April and October 2008, the permittee attended meetings with the Monrovia-Arcadia-Duarte Town Council at the Live Oak Library adjacent to the Project site to address the Council's concerns regarding, among others, the estimated selling price of the proposed units, the timing of the Mobilehome Park closure, the Project's potential traffic impacts, and the feasibility of adding an additional entrance to the site via Live Oak Avenue. On May 7, 2008, May 9, 2008, and October 6, 2008, the permittee attended meetings with local residents at locations near the Project site to address concerns about the Project raised by residents, including, among others, the Project's potential impact on their privacy and on traffic.
23. In response to the concerns raised by the community, the permittee reduced the density of the Project from 334 units to 318 units, reduced the Project's proposed building heights from multi-story to one story in cases where the involved building would be adjacent to a single-family residence, eliminated windows facing the outer perimeter of the site, and installed additional landscape screening along the site's perimeter. The permittee also redesigned the Project to include a center island at the main entry along Mayflower Avenue, and to restrict left turns into and out of the site, among other changes.

24. In September 2008, prior to the Commission's public hearing on the Project, the permittee submitted to the Department of Regional Planning ("Regional Planning") a Closure Impact Report for the closure of the Mobilehome Park, as required by section 66427.4 of the California Government Code and section 8.57.300 of Title 8 of the County Code. Regional Planning staff reviewed the Closure Impact Report and requested changes be made, including, among others, to increase the amount of the relocation benefit payments otherwise required by the County relocation guidelines ("Relocation Guidelines"), to adjust for inflation, for Mobilehome Park residents who would be required to relocate as a result of the Project.
25. In February 2010, prior to the Commission's public hearing on the Project, the permittee submitted to Regional Planning a revised Closure Impact Report which included, among other changes, the increased relocation benefit payments requested by Regional Planning. In July 2010, Regional Planning staff reviewed the revised report and requested additional clarifications concerning, among other things, relocation costs and proposed mitigation measures. The permittee provided written responses to staff's concerns in August 2010. In September 2010, as required by the County Community Development Commission ("CDC"), the revised Closure Impact Report was further reviewed by a third-party consultant, which reported in writing that the Closure Impact Report met the requirements of the California Government Code and the County Code, subject to several minor modifications. The Project is conditioned to require the permittee to prepare an addendum to the Closure Impact Report to make the these minor modifications.
26. In January 2010, prior to the Commission's public hearing on the Project, an Initial Study was prepared for the Project in compliance with the California Environmental Quality Act (Public Resources Code section 21000, et seq.) ("CEQA"), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County. Based on the Initial Study, Regional Planning staff determined that a Mitigated Negative Declaration ("MND") was the appropriate environmental document for the Project. The mitigation measures necessary to ensure the Project will not have a significant effect on the environment are contained in the Mitigation Monitoring Program ("MMP") prepared for the Project.
27. The Commission held a duly-noticed public hearing on the Project Permits, Vesting Map, Plan Amendment, and Zone Change on October 20, 2010. At the hearing, the Commission heard a presentation from Regional Planning staff and testimony in support of and in opposition to the Project. The permittee testified, among other things, that the Project would replace an "obsolete" mobilehome park, would include a senior housing set-aside which will allow seniors to remain in the neighborhood, was designed to direct traffic away from neighborhood streets, and was redesigned with reduced building heights and modified window configurations to address the privacy concerns of local residents. Project opponents raised, among other concerns: (a) the Project's potential impacts on

privacy, traffic, air quality, noise, and aesthetics; (b) the adequacy of the relocation assistance identified in the Closure Impact Report; and (c) the adequacy of the MND, which they claimed fails to address the Project's impact on greenhouse gases.

After hearing all testimony, the Commission closed the public hearing, adopted the MND and MMP, approved the Project Permits and Vesting Map, and recommended adoption of the Plan Amendment and Zone Change to the Board.

28. Pursuant to section 22.60.230(B)(2) of the County Code, because the Project approvals included a recommendation by the Commission to the Board on the Plan Amendment and Zone Change, the Project Permits and Vesting Map were called up for review by the Board concurrently with the request for the Plan Amendment and Zone Change.
29. On November 22, 2011, the Board conducted a duly-noticed public hearing on the Project Permits, Vesting Map, Plan Amendment, and Zone Change. The Board heard a presentation by staff from Regional Planning and the County Department of Public Works ("Public Works"), testimony from the permittee's representative, and testimony in opposition to the Project. Staff testified that the permittee redesigned the Project in response to community concerns, which redesign included reducing the Project's number of units, lowering the height of buildings near neighboring properties, and providing additional access to the Project via Live Oak Avenue.
30. During Regional Planning staff's presentation at the public hearing, staff recommended to the Board: (a) that the Board approve minor modifications to the Project which had not been presented to the Commission, which modifications included, among others, reconfiguring building footprints to minimize garage frontage, adding shade landscaping to parking areas, adding a pedestrian connection to Live Oak Avenue, and changing a proposed exit from the site onto Live Oak Avenue to a combined entrance and exit; and (b) that the Project's proposed zoning designation be changed from the R-3-22U-DP designation that had been recommended to the Commission to R-3-24U-DP in order to accommodate the Project's proposed 318 units.
31. At the conclusion of staff's presentation at the public hearing, the Board instructed staff to analyze and correct any potential traffic visibility and safety issues on Live Oak Avenue created by the Project, and include any such changes in the final documents for approval. Such changes were made by staff in the final findings and conditions for the Project Permits.
32. During the Board's November 22, 2011 public hearing on the Project, the permittee's representative offered testimony similar to that presented to the Commission, including testimony that the Project will not require the expenditure of any public funds but will generate payments of \$1.5 million to the local school district, \$700,000 to the parks fund, and \$700,000 in permit fees, and will

generate \$1.8 million in annual property tax increment. The opposition testimony was similar to the opposition testimony before the Commission, and raised concerns regarding, among others, the Project's impact on traffic and its compatibility with the surrounding neighborhood.

33. At the conclusion of the November 22, 2011 public hearing, the Board adopted the MND and associated MMP for the Project, and indicated its intent to approve the Project with the recommendations proposed by Regional Planning and Public Works staff, subject to the Board's direction to the Director of Public Works and the Director of Regional Planning to correct any potential problems created by the Project with respect to traffic visibility and safety issues on Live Oak Avenue.
34. The Board finds that the Project is consistent with the proposed R-3-24U-DP zoning classification because attached multi-family residences are permitted in the proposed R-3-24U-DP zone pursuant to sections 22.20.260 and 22.40.040 of the County Code. The Board further finds that the Project complies with the density provisions of the proposed R-3-24U-DP zone because the total number of units for the Project is within the maximum density allowed for the proposed R-3-24U-DP zone with the density bonus. The Board further finds that, with the related Vesting Map and the attached conditions, the Project will comply with the requirements of the -DP overlay zoning.
35. The Board finds that proposed subdivision and the provisions for its design and improvements are consistent with the goals and policies of the General Plan. The Board further finds that the Project promotes urban revitalization, increases the supply and diversity of housing, increases the supply of senior housing, and promotes the efficient use of land through a more concentrated pattern of urban development.
36. The Board finds that the permittee has demonstrated the suitability of the site for the proposed use, that establishment of the proposed use at such location is in conformity with good zoning practice, and that compliance with the attached conditions of approval, and the conditions of approval for the related Project Permits, will ensure compatibility with surrounding land uses and consistency with all applicable General Plan policies.
37. The Board finds that the Project site is physically suitable for the type of development and density proposed because the site has access to a County-maintained street(s), and will be served by public sewer facilities and water supplies to meet anticipated needs.
38. The Board finds that the design of the subdivision and its proposed improvements will not cause substantial environmental damage or substantial and avoidable injury to fish or wildlife or their habitat. The Board further finds that the site is not located in a significant ecological area and does not contain any stream courses or high value riparian habitat.

39. The Board finds that the housing and employment needs of the region were considered and balanced against the public service needs of local residents and available fiscal and environmental resources when the Project was determined to be consistent with the General Plan.
40. The Board finds that compatibility with surrounding land uses will be ensured through the CUP, Vesting Map, Parking Permit, and related Plan Amendment and Zone Change, which includes the -DP overlay zoning.
41. The Board finds that there is no evidence that the Project will be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the Project site.
42. The Board finds that grading for the Project is primarily required to excavate an underground parking facility to provide the necessary on-site resident and guest parking, to avoid the negative visual impacts associated with large, above-ground parking facilities, and to ensure grading is done in an orderly manner and in substantial conformance with the approved Exhibit "A." The Board further finds that the CUP will ensure that development occurring after rezoning will conform to the approved Exhibit "A" and will ensure compatibility with the surrounding area.
43. The Board finds that modifications authorized in the CUP to: (a) required yard setbacks are necessary because the orientation of the proposed lots do not follow a typical street pattern; (b) building height is necessary to accommodate the Project's density and design features in a manner that will be compatible with surrounding development; and (c) wall and fence heights are necessary to maintain security and privacy around the Project site.
44. The Board finds that the permittee intends to close the Mobilehome Park in conjunction with the approval of the Project and that closure of the Mobilehome Park will allow the site to be developed according to the Project conditions.
45. The Board finds that the permittee prepared a Closure Impact Report which is in compliance with applicable regulations, including section 66427.4 of the California Government Code and section 8.57.300 of the County Code. The Closure Impact Report sufficiently addresses the availability of adequate replacement housing in other mobilehome parks and relocation costs for each resident of the Mobilehome Park, and specifies steps to be taken by the permittee to mitigate any adverse impact to residents who will be displaced. The Board further finds that residents of the Mobilehome Park were provided notice of the public hearings on the Project and copies of the Closure Impact Report in compliance with section 66427.4 of the California Government Code, section 798.56 of the California Civil Code, and section 8.57.300 of the County Code.

46. The Board finds that the relocation benefits offered in the Closure Impact Report were appropriately adjusted to reflect 2010 rates of inflation and cost of living increases in conformity with the United States Bureau of Labor Statistics' Consumer Price Index for the Los Angeles-Riverside-Orange County area. The current relocation benefits identified in the Closure Impact Report represent a 59.7 percent increase from the rates listed in the County's Relocation Guidelines.
47. The Board finds that the Project is appropriately conditioned to require the permittee to complete the mitigation measures specified in the Closure Impact Report prior to the closure of the Mobilehome Park.
48. The Board finds that the Project is appropriately conditioned to require the permittee to comply with all notice requirements related to the closure of the Mobilehome Park as set forth in sections 798.56 and 798.57 of the California Civil Code.
49. The Board finds that, while three of the six multi-family lots on the site will not contain the number of parking spaces required by the County Code for each lot, the Project as a whole will provide more on-site parking spaces than required by the County Code for the Project's total 318 condominium units. The Board finds that the Parking Permit authorizing shared and reciprocal parking among the site's six multi-family lots is necessary and desirable to accommodate the Project's parking design, which primarily utilizes underground parking facilities and two-car garages, and which avoids large above-ground parking facilities. The Board further finds that the Project's parking will be conveniently accessible to residents and guests.
50. The Board finds that the Project's 75 senior housing units will be market rate units and will be compatible with the design of other units within the Project in terms of appearance, materials, and finished quality. The senior units will have a high quality of design with many on-site amenities conveniently accessible by seniors and will be integrated into the multi-family residential development that is compatible with the surrounding area. The Board further finds that the site is a short walking distance from the public library and bus transit stops located on Live Oak Avenue near the site, which are features beneficial to senior living.
51. The Board finds that the senior housing set-aside of 75 units constitutes more than 20 percent of the Project's total units and will assist the County to meet its senior housing needs. The Board further finds that the Project's senior housing set-aside justifies the Project's density bonus of 52 dwelling units, approved as part of the Project Permits.
52. The Board finds that the Project is appropriately conditioned to require the permittee to enter into a covenant with the County Community Development Commission and Regional Planning agreeing to set aside, for a period of not less than 30 years from the date of issuance of a certificate of occupancy for the

Project by the County, 75 dwelling units for exclusive occupancy by persons aged 55 and older.

53. The Board finds that the Project is appropriately conditioned to comply at all times with all federal and State fair housing laws, and all federal and State statutes governing "housing for older persons," as that phrase is defined in the applicable federal and State statutes, including but not limited to section 3601, et seq., of Title 42 of the United States Code, section 12955, et seq., of the California Government Code, and section 51, et seq., of the California Civil Code, and all regulations promulgated thereunder.
54. The Board finds that the technical and engineering aspects of the Project have been resolved to the satisfaction of Public Works, Regional Planning, and the County Departments of Fire, Parks and Recreation, and Public Health.
55. The Board finds that the subject property is of adequate size and shape to accommodate the yards, walls, fences, parking, landscaping, and other accessory structures except as otherwise modified, as shown on the approved Exhibit "A" and on the Vesting Map.
56. The Board finds that the permittee is subject to payment of the California Department of Fish and Game fees related to the Project's effect on wildlife resources pursuant to section 711.4 of the California Fish and Game Code.
57. The Board finds that the MMP, prepared in conjunction with the MND, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts to the environment from the Project. The Board further finds that the MMP's requirements are incorporated into the conditions of approval for this Project.
58. Approval of this Project is conditioned on the permittee's compliance with the attached conditions of approval, the conditions of approval for the Vesting Map, and the MMP.
59. The Board finds that the permittee has demonstrated suitability of the site for the proposed uses. The Board finds that establishment of the proposed uses at such location is in conformity with good zoning practice. The Board further finds that the permittee's compliance with these conditions of approval will ensure compatibility with surrounding land uses and consistency with all applicable General Plan policies.
60. After consideration of the MND and MMP, together with the comments received during the public review process, the Board finds on the basis of the whole record before it that there is no substantial evidence that the Project as revised and conditioned will have a significant effect on the environment, and further finds that the MND reflects the independent judgment and analysis of the Board.

61. The location of the documents and other materials constituting the record of proceedings upon which the Board's decision is based in this matter is the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Land Divisions Section, Regional Planning.

BASED ON THE FOREGOING, THE BOARD OF SUPERVISORS CONCLUDES THAT:

Regarding the Conditional Use Permit:

- A. The proposed use with the attached conditions and restrictions will be consistent with the adopted General Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area, or be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site, or jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in Title 22 of the County Code, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

Regarding the Mobilehome Permit:

- A. The Closure Impact Report contains all of the information required by section 66427.4 of the California Government Code and section 8.57.300 of the County Code.
- B. The relocation benefits detailed in the Closure Impact Report are consistent with the County's Relocation Guidelines.

Regarding the Parking Permit:

- A. There will be no need for each of the six multi-family lots to contain the number of parking spaces required for each lot pursuant to Part 11 of Chapter 22.52 of the County Code.
- B. There will be no conflicts arising from special parking arrangements allowing shared facilities, tandem spaces, or compact spaces.

- C. Off-site facilities will provide the required parking for the proposed use because such off-site facilities are controlled through ownership, leasing, or other arrangement by the owner of the use for which the site serves and are conveniently accessible to the main use.
- D. The requested parking permit at the location proposed will not result in traffic congestion, excessive off-site parking, or unauthorized use of parking facilities developed to serve surrounding property.
- E. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, loading facilities, landscaping, and other development features prescribed in Title 22 of the County Code.

Regarding the Housing Permit:

- A. The proposed use with the attached conditions and restrictions will be consistent with the adopted General Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area, or be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site, or jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in Title 22 of the County Code, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.
- E. The proposed use at the location has been designed to be complementary to the surrounding area in terms of land use patterns and design.
- F. The proposed use will assist in satisfying housing needs, and is viable in terms of continuing availability to meet such housing needs.

THEREFORE, THE BOARD OF SUPERVISORS:

- 1. Certifies that the MND for the Project was completed in compliance with CEQA and the State and County CEQA Guidelines related thereto; certifies that it independently considered and reviewed the MND and that the MND reflects the independent judgment and analysis of the Board as to the environmental consequences of the Project; certifies that it considered the MMP, finding that it is adequately designed to ensure compliance with the mitigation measures during Project implementation; determined that on the basis of the whole record,

there is no substantial evidence that the Project will have a significant effect on the environment; indicates that, at the conclusion of its public hearing on the Project, it adopted the MND and the MMP, and found that the MMP is adequately designed to ensure compliance with the mitigation measures during Project implementation; and

2. Approves Conditional Use Permit No. 2007-00073-(5), Mobilehome Permit No. 2010-00003-(5), Parking Permit No. 2008-00002-(5), and Housing Permit No. 2010-00001-(5), subject to the attached conditions.

**CONDITIONS OF APPROVAL
PROJECT NO. TR068400-(5)
CONDITIONAL USE PERMIT NUMBER 2007-00073-(5)
MOBILEHOME PERMIT NUMBER 2010-00003-(5)
PARKING PERMIT NUMBER 2008-00002-(5)
HOUSING PERMIT NUMBER 2010-00001-(5)**

1. This grant authorizes the closure of a 228-unit mobilehome park known as Santa Anita Village ("Mobilehome Park") and the construction of 318 residential condominium units and other site amenities and facilities on a property located at 4241 East Live Oak Avenue, in the unincorporated community of South Monrovia Islands, as depicted on the approved Exhibit "A," subject to all of the following conditions of approval.
2. Unless otherwise apparent from the context, the term "permittee" shall include the applicant and any other person, corporation, or other entity making use of this grant.
3. This grant shall not be effective for any purpose unless and until the Los Angeles County ("County") Board of Supervisors ("Board") adopts the related General Plan Amendment No. 2007-00002-(5) ("Plan Amendment") and related Zone Change No. 2007-00004-(5) ("Zone Change"), and both the Plan Amendment and Zone Change have become effective.
4. This grant shall not be effective for any purpose and cannot be used unless and until the permittee, and the owner of the subject property if other than the permittee, have filed at the County Department of Regional Planning ("Regional Planning") their affidavit stating that they are aware of, and agree to accept, all of the conditions of this grant, until the conditions have been recorded as required by Condition No. 5, and until all required monies have been paid pursuant to Condition Nos. 10, 11, and 16. Notwithstanding the foregoing, this Condition No. 4 and Condition Nos. 2, 6, 7, 10, 11, 15, and 16 shall become immediately effective upon final approval by the County.
5. Prior to the use of this grant, the terms and conditions of the grant shall be recorded in the office of the County Registrar-Recorder/County Clerk ("Recorder"). Upon recordation, an official copy of the recorded conditions shall be provided to the Director of Regional Planning ("Director"). In addition, upon any sale, transfer, or lease of the subject property during the term of this grant, the permittee shall promptly provide a copy of the grant and its terms and conditions to the buyer, transferee, or lessee, as applicable, of the subject property.
6. The permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit

approval, which action is brought within the applicable time period of section 65009 of the California Government Code, or any other applicable limitations period. The County shall notify the permittee of any such claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to notify the permittee of any claim, action, or proceeding, or the County fails to reasonably cooperate in the defense, the permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.

7. In the event that any claim, action, or proceeding as described above is filed against the County, the permittee shall within 10 days of the filing pay Regional Planning an initial deposit of \$5,000, from which actual costs shall be billed and deducted for the purpose of defraying the expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance to permittee or permittee's counsel. The permittee shall also pay the following supplemental deposits from which actual costs shall be billed and deducted:

- A. If during the litigation process, actual costs incurred reach 80 percent of the amount on deposit, the permittee shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.
- B. At the sole discretion of the permittee, the amount of an initial or supplemental deposit may exceed the minimum amounts defined herein.

The cost for collection and duplication of records and other related documents shall be paid by the permittee in accordance with section 2.170.010 of the Los Angeles County Code ("County Code").

8. This grant shall expire unless used within two years after the recordation of a final subdivision map as authorized by the related Vesting Tentative Tract Map No. 068400-(5) ("Vesting Map") approval, or, if the permittee records multiple final subdivision maps, within two years after the recordation of the last of the multiple final subdivision maps. In the event that the Vesting Map should expire without the recordation of a final map, this grant shall terminate upon the expiration of the Vesting Map.
9. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permits shall be void and the privileges granted hereunder shall lapse.
10. The subject property shall be developed, maintained, and operated in full compliance with the conditions of this grant, the conditions of the related Vesting Map, the mitigation measures identified in the attached Mitigation Monitoring Program ("MMP"), and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the permittee to

cease any development or activity not in full compliance shall be a violation of these conditions. Within 30 days of the effective date of this grant, the permittee shall deposit with the County the sum of \$6,000. These monies shall be placed in a performance fund which shall be used exclusively to compensate Regional Planning for all expenses incurred while inspecting the premises to determine the permittee's compliance with the conditions of approval, including adherence to development in accordance with the approved Exhibit "A." The fund provides for 30 annual inspections. Inspections shall be unannounced.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the permittee shall be financially responsible for and shall reimburse Regional Planning for all additional inspections and for any enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be the amount equal to the recovery cost at the time of payment (currently \$200 per inspection).

11. Within three (3) days of the final approval date of this grant, the permittee shall remit processing fees payable to the County in connection with the filing and posting of a Notice of Determination ("NOD") for this project and its entitlements in compliance with section 21152 of the California Public Resources Code. The project is not *de minimus* in its effect on fish and wildlife and is not exempt from payment of a fee to the California Department of Fish and Game ("Fish and Game") pursuant to section 711.4 of the California Fish and Game Code. The permittee shall pay the fee in effect at the time of the filing of the NOD, currently \$2,101.50 for a Mitigated Negative Declaration plus a \$75 processing fee. No land use project subject to this requirement is final, vested, or operative until the fee is paid.
12. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the County Regional Planning Commission ("Commission") or a County hearing officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or hearing officer finds that these conditions have been violated, or that this grant has been exercised so as to be detrimental to the public health or safety, or so as to be a nuisance. In the event that the County deems it necessary to initiate such proceedings pursuant to Part 13 of Chapter 22.56 of the County Code, the permittee shall compensate the County for all costs incurred in such proceedings.
13. The subject property shall be developed and maintained in substantial compliance with the approved Exhibit "A." In the event that subsequent revised plans are submitted, the permittee shall submit four copies of the proposed plans to the Director for review and approval. All revised plans must be accompanied by the written authorization of the property owner(s) for such revision.

14. The mitigation measures specified in the MMP are incorporated herein by this reference and made conditions of approval of this grant. The permittee shall comply with all such conditions/changes in accordance with the attached MMP. As a means of ensuring the effectiveness of such conditions and/or changes to the project, the permittee shall submit mitigation monitoring reports to Regional Planning for review and approval as frequently as may be required by Regional Planning, until such time as all mitigation measures have been implemented and completed or Regional Planning determines such mitigation measures are no longer necessary. The reports shall describe the status of the permittee's compliance with the required project conditions/changes.
15. Within 30 days following the final approval date of this grant, the permittee shall record a covenant with the County, attaching the MMP, and agreeing to comply with the required environmental mitigation measures imposed in the MMP. Prior to recordation, the permittee shall submit a copy of the draft covenant to Regional Planning for review and approval.
16. Within 30 days following the final approval date of this grant, the permittee shall deposit the sum of \$3,000 with Regional Planning in order to defray the cost of reviewing the permittee's reports and verifying compliance with the information contained in the reports required by the MMP. The permittee shall retain a qualified environmental/mitigation monitoring consultant, subject to the approval of the Director, to ensure the implementation and reporting of all applicable mitigation measures in the MMP.
17. The permittee shall implement all mitigation measures specified in the attached Closure Impact Report, and any addenda or supplements thereto, including but not limited to, providing the monetary and advisory assistance described therein.
18. Prior to the conversion, closure, or cessation of the use of the Mobilehome Park, the permittee shall submit to Regional Planning an addendum to the Closure Impact Report which addresses, to the satisfaction of Regional Planning, the additional elements and topics recommended in the attached letter from Epic Land Solutions, Inc., dated October 4, 2010.
19. The permittee shall comply with all notice requirements related to the closure of the Mobilehome Park as set forth in sections 798.56 and 798.57 of the California Civil Code.
20. The permittee shall convert, close, or cease the use of the Mobilehome Park within 36 months after the permittee records its final subdivision map as authorized by the related Vesting Map, or, if the permittee records multiple final subdivision maps, within 36 months after the permittee records the last of its multiple final subdivision maps. In the event the permittee fails to convert, close, or cease the use of the Mobilehome Park within the time required by this condition, the approval by the Board of the Closure Impact Report shall expire and become null and void. Thereafter, the permittee shall be prohibited from

converting, closing, or ceasing the use of the Mobilehome Park until such time as a new closure impact report is submitted to Regional Planning and approved by the Commission and, if applicable, the Board. Notwithstanding the foregoing, on or before the date the Closure Impact Report would expire pursuant to this Condition No. 20, the permittee may submit an application to Regional Planning, for consideration by the Commission, to extend the life of the Closure Impact Report up to an additional 36 months, which application shall be subject to the requirements and procedures, including the notice and hearing procedures, in section 8.57.300 of the County Code and any applicable State law.

21. At any time prior to the conversion, closure, or cessation of the use of the Mobilehome Park, the Commission may, in its discretion, and upon good cause shown, initiate proceedings to revoke or amend the Closure Impact Report. Good cause may include, but not be limited to: (a) a change of circumstances rendering any condition or requirement of the Closure Impact Report no longer necessary or appropriate; (b) a discovery that the Closure Impact Report contains any intentional or negligent misrepresentation of a material fact; and (c) the permittee's failure to comply with any condition or requirement of the Closure Impact Report. If the Closure Impact Report is ever revoked by the Commission, or the Board, if applicable, the permittee shall be prohibited from converting, closing, or ceasing the use of the Mobilehome Park unless and until a new closure impact report is submitted to Regional Planning, and approved by the Commission and, if applicable, the Board. Any proceeding by the Commission to revoke or amend the Closure Impact Report, and any application to approve a new closure impact report, shall be subject to the requirements and procedures of section 8.57.300 of the County Code and any applicable State law.
22. In conformance with the approved parking plans on file with Regional Planning, the permittee shall provide and continuously maintain a minimum of 746 parking spaces on-site, of which at least 638 shall be reserved for residents and at least 108 shall be reserved for guests. Each of these parking spaces shall be developed in accordance with the specifications described in section 22.52.1060 of the County Code.
23. Of the 108 guest parking spaces required for the project, a minimum of 12 spaces shall be disabled parking spaces. Not less than two of the 12 disabled parking spaces shall be "van-accessible" in compliance with the federal Americans with Disabilities Act (ADA) Accessibility Guidelines. Prior to obtaining any building permit for the project, the permittee shall submit to the Director for review and approval three copies of a revised Exhibit "A" which shall depict the required disabled parking spaces for the project, including the "van-accessible" spaces.
24. On-site parking spaces shall be continuously available for vehicular parking only, and shall not be used for storage, automobile repair, or any other use not specifically authorized by these conditions. Inoperable vehicles shall not be parked or stored in any on-site parking space. The permittee shall provide for

the enforcement of this condition in the covenants, conditions and restrictions ("CC&Rs") for the project, to the satisfaction of the Director.

25. The project shall contain at least 75 dwelling units reserved for occupancy by persons aged 55 years and older, which units shall be contained within the 75-unit condominium tower located on the southern portion of the project site, as depicted on the approved Exhibit "A." The design of the senior units shall be substantially identical to the design of the project's non-senior units in terms of appearance, materials and visual, architectural, and finished quality.
26. Prior to obtaining any building permit for the project, the permittee shall enter into a covenant with the County Community Development Commission and Regional Planning agreeing to set aside, for a period of not less than 30 years from the date of issuance of a certificate of occupancy for the project by the County, 75 dwelling units for exclusive occupancy by persons aged 55 and older.
27. The project shall comply at all times with all federal and State fair housing laws, and all federal and State statutes governing "housing for older persons," as that phrase is defined in the applicable federal and State statutes, including but not limited to section 3601, et seq., of Title 42 of the United States Code, section 12955, et seq., of the California Government Code, and section 51, et seq., of the California Civil Code, and all regulations promulgated thereunder.
28. Other than as authorized by the federal and State laws identified in Condition No. 27, the permittee shall be prohibited from restricting the sale or rental of any unit or any portion of the site on the basis of age, sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, familial status, or sexual orientation of any person. The permittee shall further be prohibited from establishing or allowing any practice of discrimination or segregation in determining the selection, location, number, use or occupancy of any resident, tenant, lessee, subtenant, sublessee, or vendee of the site or any portion thereof.
29. The CC&Rs for all units within the project shall contain and be subject to the following non-discrimination/non-segregation clause:

Except as authorized by United States and California law governing "housing for older persons" (section 3601, et seq., of Title 42 of the United States Code, section 12955, et seq., of the California Government Code, and section 51, et seq., of the California Civil Code), there shall be no discrimination against or segregation of any person, or group of persons, on account of age, sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, familial status, or sexual orientation in the sale, lease, sublease, transfer, use, occupancy, tenure, or enjoyment of these premises.
30. The non-discrimination/non-segregation provisions set forth in Conditions Nos. 28 and 29 shall remain in effect in perpetuity.

31. Prior to obtaining any building permit for the project, the permittee shall submit a revised Exhibit "A" to the Director for review and approval which shows, to the satisfaction of the Director, the project's proposed window treatments and details, façade materials, and roofing materials.
32. Prior to obtaining any building permit for the project, the permittee shall make any improvements to Live Oak Avenue which are necessary to mitigate visibility and safety issues created by the project's entrance/exit located on such avenue, to the satisfaction of the Director and the Director of the County Department of Public Works ("Public Works").
33. The CC&Rs for the project shall grant all residents of the project the right to use the internal driveway system and guest parking spaces throughout the entire subdivision.
34. The CC&Rs for the project shall provide for the continuous maintenance of the common areas, including driveways, landscaping, and the lighting system along all walkways and outdoor seating areas, to the satisfaction of the Director.
35. The parking of recreational vehicles shall not be allowed on the subject property and the CC&Rs for the project shall set forth this prohibition and provide for its enforcement.
36. Outdoor storage of any kind shall not be allowed on the subject property and the CC&Rs for the project shall set forth this prohibition and provide for its enforcement.
37. All structures, walls, and fences open to public view shall remain free of extraneous markings, drawings, or signage that do not directly relate to the use of the property or provide pertinent information about the premises. In the event any such extraneous markings become visible, the permittee shall remove or cover said markings, drawings, or signage within 24 hours following their visibility, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces. The CC&Rs for the project shall establish a method and protocol for the removal of graffiti and other extraneous markings prohibited by this condition.
38. The following development program conditions shall apply to the project:
 - A. No building or structure of any kind shall be built, erected, or moved onto any part of the property, unless it is allowed under the development program or constitutes a temporary structure used exclusively to develop the project in accordance with the development program, such as a temporary structure used as a leasing office or work trailer.
 - B. No existing building or structure which is required to be demolished under the development program shall remain on the subject property.

- C. No existing building or structure which is required to be altered under the development program shall be used until such building or structure has been so altered.
 - D. All improvements for each phase of development shall be completed prior to the occupancy of any structures within that phase of development, to the satisfaction of the Director.
 - E. Where one or more buildings in the development are designated as a primary building, no building permit shall issue for any building or structure not designated as a primary building until the foundations have been constructed for any and all primary buildings.
39. The following development standards are permitted for the project:

Building Setbacks

- A. Lot No. 1: A rear-yard setback of 10 feet for Building No. 10.
- B. Lot No. 2: A side-yard setback of one foot for Building No. 17, and a rear-yard setback of three feet for Building No. 11 and two feet for Building No. 17.
- C. Lot No. 3: A rear-yard setback of zero feet for Building No. 3 and two feet for Building No. 6.
- D. Lot No. 4: A rear-yard setback of two feet for Building No. 2.
- E. Lot No. 5: A rear-yard setback of four feet for Building No. 15.
- F. Lot No. 6: A side-yard setback of three feet and a rear-yard setback of six feet for Building Nos. 24 and 25.

Building Heights

- A. Building Nos. 1 through 7, 10, 16, and 18 through 23: A maximum height of 36 feet and nine inches.
- B. Building Nos. 8, 9, 11 through 15, and 17: A maximum height of 37 feet.
- C. Building No. 24: A maximum height of 66 feet and 4 inches.
- D. Building No. 25: A maximum height of 64 feet and 8 inches.

Walls and Fences

- A. Lot Nos. 1, 3, 4, and 6: A maximum wall/fence height of up to six feet within the required front-yard setback.
 - B. Lot No. 2: A maximum wall/fence height of up to eight feet within the required front-yard setback.
 - C. Lot Nos. 2, 3, 4, 5, and 6: A maximum wall/fence height of up to eight feet within the required side yard setback.
 - D. Lot Nos. 1 and 6: A maximum wall/fence height of up to eight feet within the required rear-yard setback.
- 40. All utilities for the project shall be placed underground.
 - 41. All structures in the project shall comply with the requirements of Public Works' Division of Building and Safety, the County Forester and Fire Warden ("Fire Department"), and the County Department of Public Health ("Public Health").
 - 42. The permittee shall not detonate any explosives or other blasting devices or materials unless and until it has obtained all necessary permits to conduct such blasting activity and has notified all adjacent property owners of any blasting activity.
 - 43. Grading and construction activities, including appurtenant activities such as engine warm-up, shall only take place between the hours of 8:00 a.m. and 6:00 p.m., Monday through Friday, and 8:00 a.m. and 5:00 p.m. on Saturdays. No grading or construction activities shall occur on Sundays or legal holidays.
 - 44. The permittee shall develop and implement a dust control plan for all grading and construction activities to the satisfaction of the Director and the Director of Public Works.
 - 45. The permittee shall, upon commencement of any grading activity allowed by this grant, diligently pursue all grading to completion.
 - 46. The permittee shall not allow any construction equipment or vehicles to be parked or stored on any existing public or private street.
 - 47. The permittee shall obtain all necessary permits from Public Works and shall maintain all such permits in full force and effect throughout the life of this grant.
 - 48. All construction and development on the site shall comply with the applicable provisions of the California Building Code and the various mechanical, electrical, plumbing, fire, grading, and excavation codes currently adopted by the County.

49. The permittee shall incorporate water-conserving devices and technologies into the project, in compliance with local, State, and/or federal regulations, to the satisfaction of the Director of Public Works.
50. The project shall comply with the County's green building and drought-tolerant landscaping ordinances. Prior to obtaining any building permit for the project, the permittee shall submit a revised Exhibit "A" to the Director for review and approval which demonstrates the project's compliance with these ordinances.
51. The site shall be developed and maintained in compliance with the requirements of Public Health. Adequate water and sewage disposal facilities shall be provided to the satisfaction of said department.
52. Upon approval of this grant, the permittee shall contact the Fire Prevention Bureau of the Fire Department to determine what facilities may be necessary to protect the property from fire hazard. Any necessary facilities, including but not limited to, water mains, fire hydrants, gated access width, emergency access, and fire flow facilities, shall be provided to the satisfaction of and within the time periods established by the Fire Department.
53. Prior to obtaining any grading or building permit for the project, the permittee shall submit a site plan to the Director for review and approval which demonstrates that any proposed grading and construction complies with the conditions of this grant and with the County Code.
54. Prior to obtaining any grading or building permit for the project, the permittee shall submit three copies of a landscape plan to the Director for review and approval, which landscape plan may be incorporated into a revised Exhibit "A." The landscape plan shall show the size, type, and location of all on-site plants, trees, and watering facilities. The landscaping plan shall also contain a phasing schedule establishing the timing and sequencing of all proposed landscaping. Landscape planting shall begin at least 90 days prior to, and shall be completed not later than six months following, the issuance of a certificate of occupancy for the project. All landscaping shall be maintained in a neat, clean, and healthful condition, and proper pruning, weeding, removal of litter, fertilizing, and replacement of plants shall occur when necessary. To the maximum extent feasible, drip irrigation systems shall be used for landscape watering.
55. All development shall comply with the requirements of Title 22 of the County Code and the specific zoning of the subject property, except as modified by this grant, as set forth in these conditions or as shown on the approved Exhibit "A" or a revised Exhibit "A" approved by the Director.
56. The permittee shall maintain the subject property in a neat and orderly fashion and free of litter. Yard areas that are visible from the street shall be free of debris, trash, lumber, overgrown or dead vegetation, broken or discarded furniture, and household equipment such as refrigerators, stoves, and freezers.

57. Pursuant to Chapter 22.72 of Title 22 of the County Code, prior to obtaining any building permit for the project, the permittee shall pay a fee to the County Librarian in the amount required by said chapter at the time of payment, and provide proof of payment to Regional Planning.

Attachments:

Mitigation Monitoring Program (Pages 1-3)

Closure Impact Report (Pages 1-55)

Epic Land Solutions, Inc., letter dated October 4, 2010

TR068400/RENV1200700062/RPAT200700002/RZCT200700004/RCUPT200700073
Mitigation Monitoring Program

No.	Impact Mitigation	Responsible Agency or Party	Monitoring Agency or Party	Timing
Geotechnical				
1	Implement Geotechnical Engineering Investigation - dated 3/14/07, Chapter 7 - Conclusions and Recommendations, and addendums thereof.	Project Applicant	DPW	Permits
Noise				
2	Limit all construction activities near occupied on- and off-site residences to between the hours of 8:00 AM and 6:00 PM and excluded on all Sundays and County-observed holidays.	Project Applicant	DPW Project Applicant	Construction
3	All construction equipment, stationary and mobile, operating on the project site shall be equipped with properly operating and maintained noise buffering muffler system or other noise reducing feature, reducing equipment noise levels to conform to applicable County standards.	Project Applicant	DPW Project Applicant	Construction
4	Implement noise mitigation measures discussed in the Mestre Greve Noise Assessment dated 2/23/07, and summarized as follows: a. Construct a 16-ft. high temporary noise -sound blanket-barrier along the north and west perimeter property lines, and 9-ft. high temporary sound blanket-barrier along the south and east perimeter property lines, or a structure equal to or of greater mitigation. b. On-site loading and staging areas shall be located at least 50 ft. from existing residential dwellings.	Project Applicant	DPW	Plan check
5	Reduce construction equipment emissions by implementing use of a series of measures inclusive of low emission construction equipment, low sulfur fuel, pre-coated/colored materials, and existing power.	Project Applicant	DPW Project Applicant	Construction
6	Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturer's specifications and per SCAQMD rules, to minimize exhaust.	Project Applicant	DPW Project Applicant	Construction
7	Suspend use of all construction equipment operations during applicable smog alerts.	Project Applicant	DPW Project Applicant	Construction
Air Quality				

No.	Impact Mitigation	Responsible Agency/Party	Action Required	Monitoring Agency/Party	Timing
8	Use electricity from power poles when present, practicable, and cost-effective rather than temporary diesel or gasoline-powered generators.	Project Applicant	Plan check	DPW Project Applicant	Plan checking
9	Use methanol- or natural gas-powered mobile equipment instead of diesel if readily available at competitive prices.	Project Applicant	Inspection monitoring	DPW Project Applicant	Permits
10	Use propane- or butane-powered on-site mobile equipment instead of gasoline if readily available at competitive prices.	Project Applicant	Plan check review	DPW Project Applicant	Plan checking
11	Implement air quality measures – inclusive of ROG measures, as discussed in the Mestre Greve Associates report dated 12/18/08, as follows: a. Use pre-coated, pre-colored and naturally colored building materials, and use of high volume-low pressure sprayers. b. Utilize low emission, tank-less water heaters to reduce natural gas consumption and emissions. c. Utilize built-in, energy-efficient appliances and automated controls for HVAC to reduce energy consumption and emissions. d. Provide shade trees in subject development to reduce building heating/cooling needs as depicted in the landscape plan. e. Install sunlight filtering window coatings, double-paned windows or window treatments to meet or exceed Title 24 Energy requirements. f. Use roof materials that maximize reflection of sunlight and minimize heat gains in buildings, thus reducing dependence on HVAC.	Project Applicant	Implement report recommendations	DRP	Plan checking
Sewer, Traffic, Biota, Drainage and Grading, Relocation.					
12	Provide and implement studies and analysis – Sewer Study, Traffic Study, Biological Assessment, Drainage/Grading and Closure Impact Report, as made a condition of approval.	Project Applicant	Implement report recommendations	DRP and DPW	Permits
Water Conservation					
13	Utilize high-efficiency dual-flush toilets to reduce water consumption.	Project Applicant	Install dual flush toilets	DPW	Permits

Key: DPW = Los Angeles County Department of Public Works. DRP, Los Angeles County Department of Regional Planning

**PROJECT MITIGATION MEASURES
DUE TO ENVIRONMENTAL EVALUATION**

Project No.: VTTM No. 068400(RPAT200700002/RZCT200700004/RCUP200700073)

The Department of Regional Planning ("DRP") staff has determined that the following mitigation measures for the project are necessary in order to assure that the proposed project will not cause significant impacts on the environment.

The Permittee shall deposit the sum of \$3,000.00 with the DRP within 30 days of Permit approval in order to defray the cost of reviewing and verifying information contained in reports required by the Mitigation Monitoring Program.

1. Implement Geotechnical Engineering Investigation – dated 3/14/07, Chapter 7 - Conclusions and Recommendations, and addendums thereof.
2. Limit all construction activities near occupied on- and off-site residences to between the hours of 8:00 AM and 6:00 PM and excluded on all Sundays and County-observed holidays.
3. All construction equipment, stationary and mobile, operating on the project site shall be equipped with properly operating and maintained noise buffering muffler system or other noise reducing feature, reducing equipment noise levels to conform to applicable County standards.
4. Implement noise mitigation measures discussed in the Mestre Greve Noise Assessment dated 2/23/07, and summarized as follows:
 - a. Construct a 16-ft. high temporary noise –sound blanket-barrier along the north and west perimeter property lines, and 9-ft. high temporary sound blanket-barrier along the south and east perimeter property lines, or a structure equal to or of greater mitigation.
 - b. On-site loading and staging areas shall be located at least 50 ft. from existing residential dwellings.
5. Reduce construction equipment emissions by implementing use of a series of measures inclusive of low emission construction equipment, low sulfur fuel, pre-coated/colored materials, and existing power.
6. Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturer's specifications and per SCAQMD rules, to minimize exhaust.
7. Suspend use of all construction equipment operations during applicable smog alerts.
8. Use electricity from power poles when present, practicable, and cost-effective rather than temporary diesel or gasoline-powered generators.
9. Use methanol- or natural gas-powered mobile equipment instead of diesel if readily available at competitive prices.
10. Use propane- or butane-powered on-site mobile equipment instead of gasoline if readily available at competitive prices.
11. Implement air quality measures – inclusive of ROG measures, as discussed in the Mestre Greve Associates report dated 12/18/08, as follows:
 - a. Use pre-coated, pre-colored and naturally colored building materials, and use of high volume-low pressure sprayers.
 - b. Utilize low emission, tank-less water heaters to reduce natural gas consumption and emissions.
 - c. Utilize built-in, energy-efficient appliances and automated controls for HVAC to reduce energy consumption and emissions.
 - d. Provide shade trees in subject development to reduce building heating/cooling needs as depicted in the landscape plan.
 - e. Install sunlight filtering window coatings, double-paned windows or window treatments to meet or exceed Title 24 Energy requirements.
 - f. Use roof materials that maximize reflection of sunlight and minimize heat gains in buildings, thus reducing dependence on HVAC.
12. Provide and implement studies and analysis – Sewer Study, Traffic Study, Biological Assessment, Drainage/Grading and Closure Impact Report, as made a condition of approval.
13. Utilize high-efficiency dual-flush toilets to reduce water consumption.

As the Applicant, I agree to incorporate these mitigation measures into the project, and understand that the public hearing and consideration by the Planning Commission will be on the project as mitigation measures.

Applicant Prime Enterprises, LLC

7/22/09
Date

[] No response within 10 days. Environmental Determination requires that these changes/conditions be included in the project

Staff

Date



Santa Anita Village Mobilehome Park

Closure Impact Report

Prepared by:

Overland, Pacific & Cutler, Inc.
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Long Beach, California 90808
www.opcservices.com

February 24, 2010

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INTRODUCTION

Prime Enterprises, LLC (the "Owner"), owner of the Santa Anita Village Mobilehome Park (the "Park") located at 4241 East Live Oak, Arcadia, California is proposing a five-phase 318 unit residential townhouse-condominium development with three- and four-story mid-rise podium residential structures with subterranean parking. No governmental assistance in any part of the proposed development is proposed. As a result of the proposed development, the closure of the Park will be required.

Pursuant to the Los Angeles County Code, Title 8, Chapter 8.57.300 (the "Code"), prior to the change of use or closure of the Park, the Owner is required to file with the Los Angeles County Planning Director, a report on the impact of the closure upon the residents who will be displaced (the "Closure Impact Report" or "CIR"). The requirements of the Code are also consistent with the requirements of California Government Code Section 65863.7; hereinafter to be also known as the "Code".

The Park, located in an unincorporated area of the County of Los Angeles within a South Arcadia community, is situated on approximately 12 acres. The Park has a total of 228 mobile home spaces. Currently, only 37 spaces are occupied and the rest are vacant (See **Exhibit A** for a map of the Park). Of the 37 occupied spaces, 23 are occupied by residents who own their mobile home and 14 are occupied by tenants renting Park owned mobile homes.

The Owner has contracted with Overland, Pacific & Cutler, Inc. (OPC), a firm with relevant experience in the closure of mobile home parks and relocation of residents from all types of housing types, to prepare the necessary CIR on the impact of the closure upon the residents of the Santa Anita Village Mobile Home Park.

In order to prepare the CIR, OPC analyzed resident data provided by the Owner, performed a comprehensive study of mobile home park and other housing resources in the surrounding area of the Park.

Consistent with the Code, the CIR presents:

1. Demographic data from the survey of the Park residents who will be displaced;
2. The availability of adequate replacement housing;
3. Reasonable relocation costs for each resident of the Park;
4. Identification of the adverse impacts of the closure; and
5. Proposed steps to be taken to mitigate adverse impacts associated with the proposed closure of the Park.

PROJECT AREA LOCATION AND DESCRIPTION

A. THE REGIONAL LOCATION

The proposed Project is located in an unincorporated area of the County of Los Angeles, within a southern area of the City of Arcadia, approximately 10 miles north-east of downtown Los Angeles. Surrounding Cities include Arcadia to the west and north, Monrovia, Irwindale and Baldwin Park to the east, El Monte to the south, and Temple City to the west. The Project site is easily accessible by Interstate Freeways 10, 210 and 605. (See Figure 1: Regional Project Location)

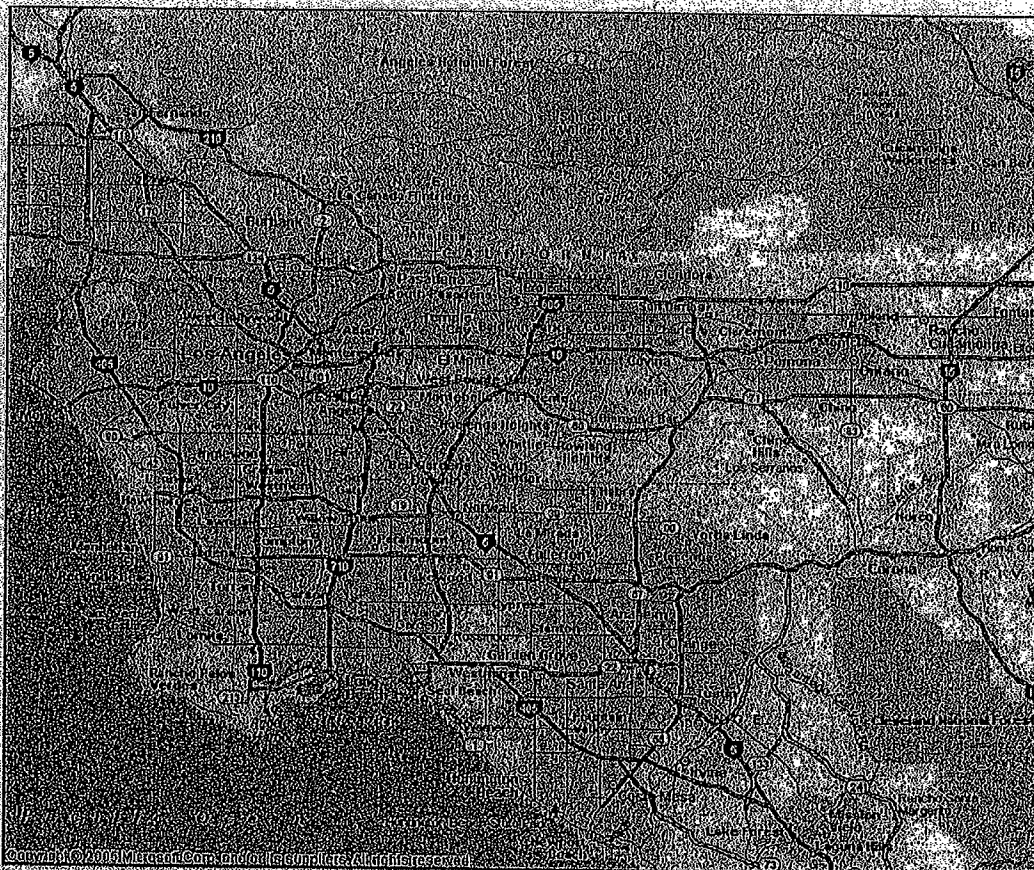


Figure 1: Regional Project Location

B. PROJECT SITE LOCATION

The proposed Project site is located at 4241 East Live Oak Avenue and it encompasses approximately 12 acres. The Project is generally bounded by East Birchcroft Street on the north, South 10th Avenue on the west, South Mayflower Avenue on the east and East Live Oak Avenue on the south. (See Figure 2: Park Site Location)

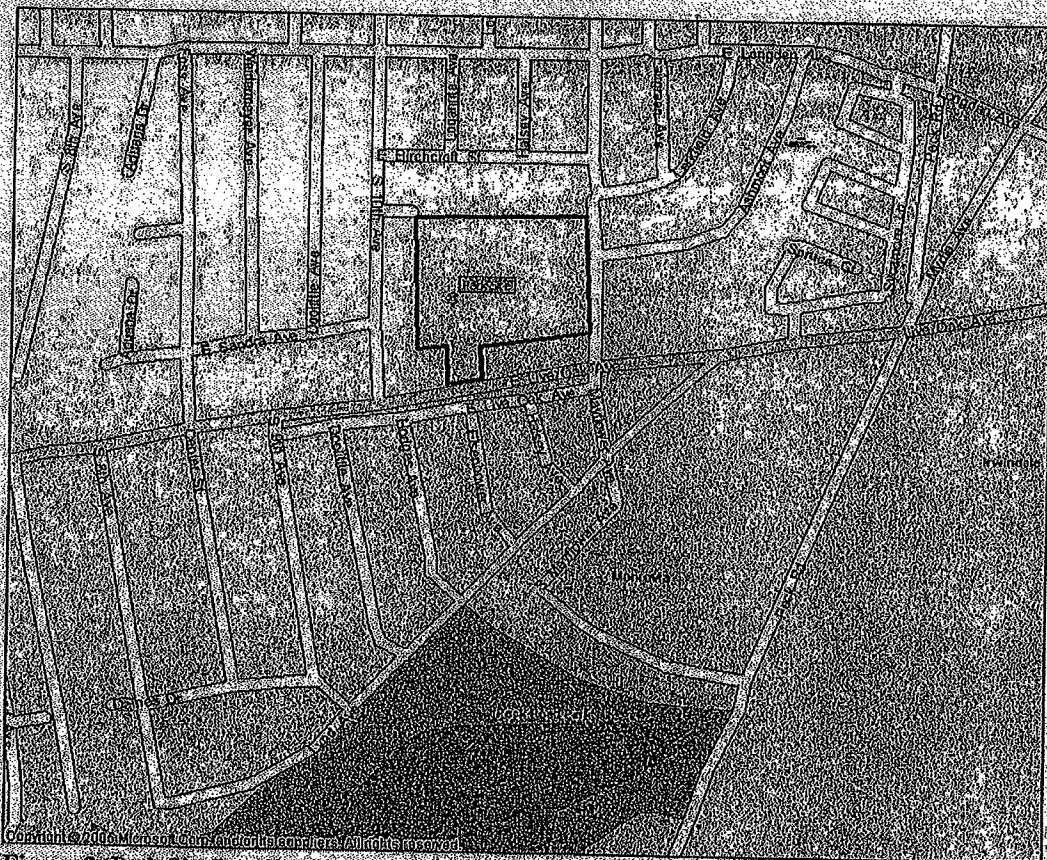


Figure 2: Park Site Location

C. LEGAL DESCRIPTION

Lot: 1 Tract No: 14525 Abbreviated Description: LOT COM AT SE COR OF LOT 1 TR # 14525 TH N 0 14'23" W 731.77 FT TH N 89 45'20" E 734.04 FT TH S ON W LINE OF MAYFLOWER AVE City/Muni/Twp: REGION/CLUSTER: 05/05416

D. TIMETABLE FOR CLOSURE OF THE PARK

After all required permits requesting the change of use for the proposed project have been approved by the Los Angeles County Planning Director, the Owner shall give the mobile home homeowners six months' or more written notice of termination of tenancy.

III. RESIDENT SURVEY

A. METHODOLOGY

Park resident information was provided by the Owner from survey information collected by Park management in July 2007 and updated in January 2010. Information was received from 36 of the 37 Park residents (97.3%). Survey questions of Park residents concerned contact information, household size and composition, income, employment, coach size and age, length and type of occupancy, disabilities/health problems and mortgage information, if any. An information and introduction letter regarding the preparation of the CIR was delivered to residents the week of December 10, 2007 (see **Exhibit B**).

B. SURVEY DATA

The Park has a total of 228 mobile home spaces. Currently, only 37 spaces are occupied and the rest are vacant (191). Of the 37 occupied spaces, 23 are occupied by residents who own their mobile home and are paying space rents ranging from \$465 to \$680 per month, with an average of \$566; 14 are occupied by tenants renting Park owned mobile homes on a month-to-month basis. Among the 36 respondents, all 36 identified themselves as full-time Park residents. The residency status of the 1 household which did not respond to the survey was assumed to be permanent based on mailing address provided by the on-site Park manager.

The resident survey data described below in sub-sections 1-4 concern respondent Park residents as well as certain assumptions made about the non-respondent household. A table summarizing survey information for all Park residents is included as **Exhibit C** to this Report.

1) Full-Time Population

Among the 37 permanent Park resident households, there are 60 adults and 6 children for a total of 66 residents. The tenure of Park residents

range from less than 1 year to 29 years with an average of 10 years.

2) Occupancy

Household size ranges from 1 to 4 individuals. The household size mix is shown in **Table 1** below.

Table 1: Household Size Mix	
Household Size (# of occupants)	# of Households
One	18
Two	12
Three	4
Four	3

3) Senior/Handicapped Households

There are 17 individuals 62 years or older residing in the Park. Four households have individuals with mobility problems expressing a preference for ground level accommodations or stair rails and ramps. Several other residents have moderate to serious health issues that, at this time, would not appear to restrict potential housing choices, but prefer to stay close to doctors, hospitals and other medical care.

4) Income

Income information was provided by 34 of 37 Park households. According to income standards for the County of Los Angeles (**Exhibit D**) adjusted for family size as published by the United States Department of Housing and Urban Development (HUD) in April 2009, 4 households qualify as extremely low (EL) income (30% or less of area median), 17 households qualify as very low (VL) income (31%-50% of area median), 10 qualify as low (L) income (51%-80% of area median), 1 qualifies as moderate (M) income (81%-120% of area median) and 2 qualify as above

moderate (AM) income (over 120% of area median). **Table 2** below outlines this information. The range of reported annual household income among the respondents was \$6,000-\$81,600.

Table 2: Income Levels of Respondent Households				
Extremely Low	Very Low	Low	Moderate	Above Moderate
4	17	10	1	2

5) Coach Data

The 23 resident-owned mobile homes in the Park range in size from 8 by 32 feet (256 square feet) to 20 by 56 feet (1,120 square feet). Most of the units have been modified with interior and exterior improvements, i.e. Expando or room additions, awnings, carports. According to the Park performed survey, excluding the Park owned mobile homes, there were 13 single-wide coaches, with or without additions, and 10 double-wide coaches.

Coach ages range from 22 years to 57 years corresponding with dates of manufacture from 1953 to 1988. **Table 3** identifies the age of Park coaches as reported by the Owner.

Table 3: Mobile Home Ages within the Park		
Year built	Age in years	# of Homes
prior - 1957	50 or more	5
1958 - 1967	40-50	13
1968 - 1977	30-40	3
1978 - 1987	20-30	1
1988 - current	22 or less	1

Although the age range of coaches in the Park is significant, it is often difficult, by exterior physical inspection, to make age distinctions because of the general level of upgrades and modifications observable throughout

the Park. These modifications range from simple family room cabanas added to older single-wide mobile homes to major interior design work in some of the double-wide mobile homes. The exteriors of most coaches reflect a mix of various improvements including porches, painting, brick work, roofs, walkways and landscaping.

6) Mortgage Data

There are no coaches in the Park with mortgage or any outstanding loans.

III. RELOCATION RESOURCES

One of the specific requirements of the Los Angeles County Code is to address the availability of adequate replacement housing in mobile home parks. Following is information on the availability of replacement sites in mobile home parks within a 20-mile radius of the City of Arcadia. Additionally, other available replacement housing resources have been researched, including mobile homes for sale, rental housing in Arcadia and surrounding cities and affordable/subsidized housing resources.

A. METHODOLOGY

Survey work was conducted in February 2010 using the following means and resources:

- Telephone survey of individual parks and apartment complexes
- Use of existing, proprietary mobile home park and rental apartment data from an OPC database
- Telephone contact with real estate companies specializing in mobile home properties

B. SURVEY RESULTS

1) Mobile Home Park Space

There are over 100 mobile home parks located within a 20-mile radius from the Park which includes both family and senior parks. Our survey included mobile home parks within Los Angeles, San Bernardino and Orange County. A complete list of the parks with the number of available spaces and conditions which were reported on the type of mobile homes and residents accepted is presented in **Exhibit E**. Based on the survey of

mobile home parks within a 20 mile radius, 79 available spaces were identified.

To further analyze the mobile home parks that may potentially accept mobile homes from the Santa Anita Village Mobilehome Park, the reported restrictions/conditions were reviewed. The main restrictions or conditions that would disqualify the Park units were the need for a new mobile home to be placed in the space. Other restrictions/conditions were spaces only available for recreational vehicles, size restrictions or spaces for owner occupied use. If the mobile home park would accept a used mobile home, it was typically qualified that the mobile home would have to be approved by management.

Based on the reported specific restrictions or conditions of mobile home parks that accept used mobile homes, 59 spaces have been identified (see **Exhibit F**).

Pad rent for mobile home spaces that may accept mobile homes from the Park ranged from \$268 - \$1,030 with an average of \$890.

2) Mobile Homes for Sale

A survey of for sale mobile homes currently on the market within Los Angeles County identified 127 mobile homes, with prices ranging from \$8,000 to \$139,000. The available mobile homes for sale that were surveyed can be found as **Exhibit G**.

3) Condominiums for Sale

While the Code requires a focus on the availability of replacement housing in mobile home parks, other alternative housing options were pursued. A survey of available condominium units in Arcadia and nearby communities was conducted. The lowest priced condominium available has an asking price of \$149,000 for a two-bedroom, three bath unit and the prices go up to \$798,000, depending on the location. The complete list of available condominium units is presented in **Exhibit H**.

4) Rental Housing

While the Code requires a focus on the availability of replacement housing in mobile home parks, other alternative housing options were pursued. In that regard, a replacement housing survey was conducted to determine the availability and cost of one-, two-, and three-bedroom rental housing units in and near Arcadia. **Table 4** shows the availability of rental units, rent ranges of available units and median rent per bedroom size.

Table 4: Availability and Cost of Rental Housing			
Bedroom Size	One	Two	Three
# Found	139	228	95
Rent Range	\$625-\$1,475	\$870-\$2,500	\$1,395-\$3,800
Median Rent	\$950	\$1,300	\$1,920

These potential replacement housing resources offer full amenities, with prices ranging from \$625 to \$1,475 for a one-bedroom unit, \$870 to \$2,500 for a two-bedroom unit and \$1,395 to \$3,800 for a three-bedroom unit. The survey identified 462 available units currently available on open market for rent either in Arcadia or within the surrounding communities.

the majority of the mobile homes could not be moved, coming up with a "relocation cost" would be speculative and subjective. Therefore, in 1991 the Los Angeles County Community Development Commission created a Summary of Benefits that is implied to be part of the Los Angeles County Code and is recommended be used in determining the "reasonable costs of relocation". Although the Code does not actually specify any such relocation benefits, it is the intention of the Owner and this CIR to accept the County's recommended Summary of Benefits as a determination of the reasonable costs of relocation.

The Summary of Benefits is enclosed as **Exhibit I**, with an updated Summary of Benefits adjusted for inflation through January 2010, along with the accompanying All Urban Consumers Price Index for the Los Angeles, Riverside and Orange County area, showing the percentage increase since 1991.

The Summary of Benefits provides for a basic flat fee benefit along with potential supplemental benefits depending on the distance of the move of the mobile home; size of the mobile home; disability, income and/or age of the resident, or if a qualifying resident instead moves to other conventional housing. Additionally, if residents have a mortgage, depending on the original purchase price of the mobile home and if it cannot be moved, an additional payment can be made based on the provisions in the Summary of Benefits.

Since a number of the relocation cost items in the Summary of Benefits are based on specific criteria and the survey information gathered was anecdotal and not supported by actual documentation, it would not be appropriate to identify the relocation costs based on the County's Summary of Benefits for each resident in the CIR. Rather, it is proposed that within a month of approval of the CIR by the advisory agency, each resident will be provided with a calculated benefit from a Summary Benefit Worksheet (see **Exhibit J**) of the relocation benefits they would be eligible to receive assuming appropriate documentation is received to support the benefit category. Otherwise, if after a month of the approval of the CIR, no supporting documentation is provided, only those items that are known will be calculated and the Summary Benefit Worksheet provided.

V. CLOSURE IMPACTS

In addition to addressing the availability of adequate replacement housing and relocation costs, as described in the previous Sections, the Owner must report on the impacts of the closure upon the displaced residents. From data gathered in the surveys, along with the information on the availability of replacement housing resources, certain impacts are noted:

1) Increase in Rental Costs

Current space rents, which have not been increased since 2008, range from \$465 to \$680 per month, with an average of \$566. Replacement space rents range from \$268 to \$1,030 per month and indicate an average increase of \$324. Current Park renters pay monthly between \$550 and \$1,000, with an average of \$779. Conventional replacement rental rates for one-, two- and three-bedroom rental units range from \$625 to \$1,475 for one-bedroom units, \$870 to \$2,500 for two-bedroom units and from \$1,395 to \$3,800 for three-bedroom units and indicate average increases of \$384, \$734 and \$1,354, respectively for mobile home owners and \$171, \$521 and \$1,141, respectively for current Park renters. Based on #2 below, increase in housing costs and/or pad rents will potentially have an adverse impact on most residents.

2) Low Income or Residents on Fixed Income

Of those reporting on income, 91% of the Park residents fall within or below the Low Income Category (4 - extremely low income, 17 - very low income and 10 - low income) (see **Exhibit D** for income limits). The fixed and low income of certain Park residents may adversely impact their ability to pay for first months rent and any security deposits, as well as pay for increased housing or qualify for a loan to purchase similar replacement housing.

3) Elderly, Disability and or Health Issues

The impact of the closure on residents who reported age, disability and health issues may limit their ability in getting to, finding and securing adequate replacement housing. Additionally, mobility or other health issues may require replacement housing with a preference for ground level accommodations or stair rails and ramps and replacement housing close to doctors, hospitals, other medical care and shopping.

4) Inability to Move Mobile Home

Coach ages range from 22 years to 57 years with 21 of the 23 being 30 years or greater. While coaches may be able to be physically "moved", it is unlikely coaches of greater than 10 years old would be accepted into other mobile home parks. The impact of not being able to move a coach into another Park requires a resident to either purchase a replacement mobile home, which they may not qualify for or have insufficient funds for such a transaction, or rent other conventional housing, e.g. an apartment.

5) Outstanding Mortgage Balances

There are no outstanding mortgage balances.

6) Disposition of Mobile Homes

All residents who cannot move their mobile home to another mobile home park face the issue of disposition of their coach. The coordination and cost will be an adverse impact to these residents as a result of the proposed closure.

VI. PROPOSED MITIGATION MEASURES

The CIR is to specify the steps to be taken by the Owner to mitigate actual adverse impacts of the proposed closure on the residents who will be displaced. However, in accordance with the Code and the State Mobile Home Residency Law, any mitigating benefits provided by the Owner shall not exceed the reasonable costs of relocation. Adverse impacts that were noted earlier were possible increases in rental costs, especially those residents that are low income or on a fixed income; elderly, disabled or health issues requiring assistance on specific replacement sites; an inability to move mobile homes to other mobile home parks; and disposition of the mobile home.

The identified adverse impacts have two main components that should be mitigated, 1) monetary assistance, and 2) advisory assistance needs. Therefore, the Owner is proposing a monetary benefit and an advisory services program which are estimated to provide reasonable costs of relocation. These mitigation measures are as follows:

A. MONETARY BENEFIT MEASURE

Residents can choose one of two options:

Option 1 - Actual Physical Move Costs

Any mobile home owner, who chooses and is able to move their mobile home, will be offered the following:

1. The reasonable cost of physically moving the mobile home and movable improvements such as patios, carports and porches, to a new site, which includes but is not limited to, dismantling, packing, moving, reassembling, rebuilding, including skirting and tie-downs, utility connections and unpacking, as necessary. Payment for the physical

transportation costs to another mobile home park shall not exceed 50 miles;

2. Payment of moving costs associated with moving all personal property based on 1) an actual move by a professional moving company not to exceed the lower of at least two written estimates to a new location up to 50 miles, or 2) a fixed moving schedule based on the number of rooms occupied (excluding hallways, bathrooms and closets) from the schedule shown in **Table 5**, below;

Table 5: Fixed Payment Moving Schedule	
Occupant Owns Furniture	
One room	\$625.00
Two rooms	\$800.00
Three rooms	\$1,000.00
Four rooms	\$1,175.00
Five rooms	\$1,425.00
Six rooms	\$1,650.00
Seven rooms	\$1,900.00
Eight rooms	\$2,150.00
each additional room	\$225.00
Occupant Does NOT Own Furniture	
First Room	\$400.00
each additional room	\$65.00

Source: Federal Highway Administration (8-22-08)

3. Payment of temporary lodging/per diem expenses for the household, if the mobile home relocation results in the homeowner being displaced over one or more nights, up to a maximum of \$150 per day not to exceed 5 days.

Option 2 - County Guideline Summary of Benefits

As a second option all mobile home owners will be offered the County's Summary of Benefits (see **Exhibit I**) as a determination for the reasonable costs of relocation. For those residents that cannot move their mobile home, the assumption will be made that it could be moved and the Owner will provide the eligible identified Summary of Benefits as if it was being moved within a 50 mile radius even though residents will have to purchase a replacement mobile home or move to other conventional housing.

One item that is not addressed in the County's Summary of Benefits is the disposition of the mobile home and attached improvements that cannot be moved. While this would be the mobile home owners obligation to remove, the Owner, upon transfer of clear title to the Owner, will take responsibility for the demolition and removal of the mobile home. Otherwise, if the mobile home owner leaves the mobile home and improvements, the calculated Summary of Benefits will be offset by the cost of demolition and removal of the mobile home.

In summary, the monetary benefit measure will:

- A. Provide all mobile home residents who can move their mobile home with their actual costs of relocation or provide a lump sum monetary amount with the appropriate Summary of Benefits calculation with an assumption their mobile home can be moved;
- B. Pay for the demolition and removal of mobile homes that cannot be moved if they are transferred to the Owner with clear title.

B. ADVISORY ASSISTANCE PROGRAM

The process of having to move and find replacement housing and all that it entails is a difficult process even under the best of circumstances. Therefore, the Owner has proposed an advisory assistance program that will provide a relocation specialist to provide non-monetary assistance in the form of housing counseling to the residents, as needed.

To start, the relocation specialist will meet with each resident and verify information collected in the tenant survey supplied for the CIR. Appropriate documentation will be requested as needed and a Summary of Benefits Worksheet will be completed and delivered to each resident showing their monetary benefit calculation. From this point and in conjunction with the Owners notice to vacate, the resident can avail themselves to their Summary Benefit. This process and procedures for residents claiming their benefit is as follows:

1. Residents will provide all necessary documentation to substantiate eligibility for the monetary assistance;
2. Assistance amounts will be determined using a Summary of Benefits Worksheet and delivered to resident;
3. Resident will notify relocation specialist of intent to move and relocation specialist, in conjunction with resident, will complete and submit to Owner required claim forms to request eligible funds;
4. Owner will review and, if in conformance with previously approved Summary of Benefits worksheet, will approve and authorize payment, or request additional information;
5. The relocation specialist will issue benefit checks, which will be available at their offices for pick-up, delivered personally or mailed, depending on circumstances;
6. Final payments will be issued after confirmation that the Project area premises have been completely vacated;
7. Receipts of payment will be obtained and maintained in the relocation case file.

It is proposed that benefit payments be managed by the relocation specialist through a trust account funded by the Owner. Easy and understandable claim forms will be provided and payments based on the Summary of Benefits Worksheet. Adequate, advance payments will be made to assist residents in securing their replacement housing choice and final payments will be made after the resident has vacated the mobile home park with any deductions made, if any, for the removal of the mobile home if left in place without transfer of clear title to Owner.

Additionally, throughout the entire relocation process, the relocation specialist will be available to assist residents with their relocation assistance needs including the following:

1. Be available to provide continuous explanation of benefits so residents have a full understanding of the issues related to the closure of the mobile home park.
2. Provide residents with on-going reports of available replacement housing to preferred locations of the resident.
3. Provide assistance as needed and requested to lessen hardships by working with the resident and real estate agents, property managers, lenders in their efforts to secure replacement housing.
4. Facilitate interaction between resident and professional furniture movers and companies that will disassemble, transport and reinstall a mobile home, health care providers and others.
5. Assist residents in inspecting replacement housing if resident does not have a car or cannot drive by coordinating transportation so resident can inspect replacement housing opportunities.
6. Provide assistance in claiming eligible monetary benefits from Owner.
7. Other individual assistance that may be required on a case by case basis.

Tenant Occupants

There are 14 tenants who are renting Park owned mobile or manufactured homes. If no waiver of relocation benefits have been signed by a tenant occupant, the tenant will be offered the County's Summary of Benefits (see **Exhibit I**) as a determination for the reasonable costs of relocation. This fee is \$1,600.

VI. CONCLUSION

The Owner of the Santa Anita Village Mobile Park has proposed a 318 unit residential development that would require the closure of the Park. The Los Angeles County Code, Title 8, Chapter 8.57.300 and California Government Code Section 65863.7, require a report on the impact the closure will have upon the residents who will be displaced. The report shall address the availability of adequate replacement housing in mobile home parks and relocation costs. Furthermore, steps are to be taken to mitigate the adverse impacts the closure of the Park may have on the residents; however, the steps to be taken shall not exceed the reasonable costs of relocation.

A search of available mobile home replacement spaces and mobile homes for sale indicated ample available space that Park mobile homes could be moved as well as mobile homes for sale. Additionally, considerable rental housing could be found in the Cities surrounding the Park. Therefore, adequate replacement housing in a variety of housing choices is available for the Park residents.

Based on the information gathered for the Report, impacts to Park residents were identified and measures were identified that could mitigate the adverse impacts the closure would have on Park residents. The mitigation measures provided adopted the County's benefit program to meet the requirements of "reasonable relocation costs". Furthermore, all options provide for a comprehensive relocation assistance program to assist residents with replacement housing resources, assisting with the securing of replacement housing by working with landlords and property managers, driving residents to replacement locations and coordinating advance and final payments of appropriate benefits.

It is believed that the CIR contains the information required by the Code and the State Mobile Home Residency Law, provides for adequate measures to mitigate impacts on the residents as a result of the proposed closure by accepting the County's Summary of Benefits which address the reasonable costs of relocation and provides for an advisory assistance program to assist

residents in their efforts to secure replacement housing. Therefore, the advisory agency for the County should approve this CIR without further conditions.

EXHIBIT A

SANTA ANITA VILLAGE MOBILITY HOME PARK MAP

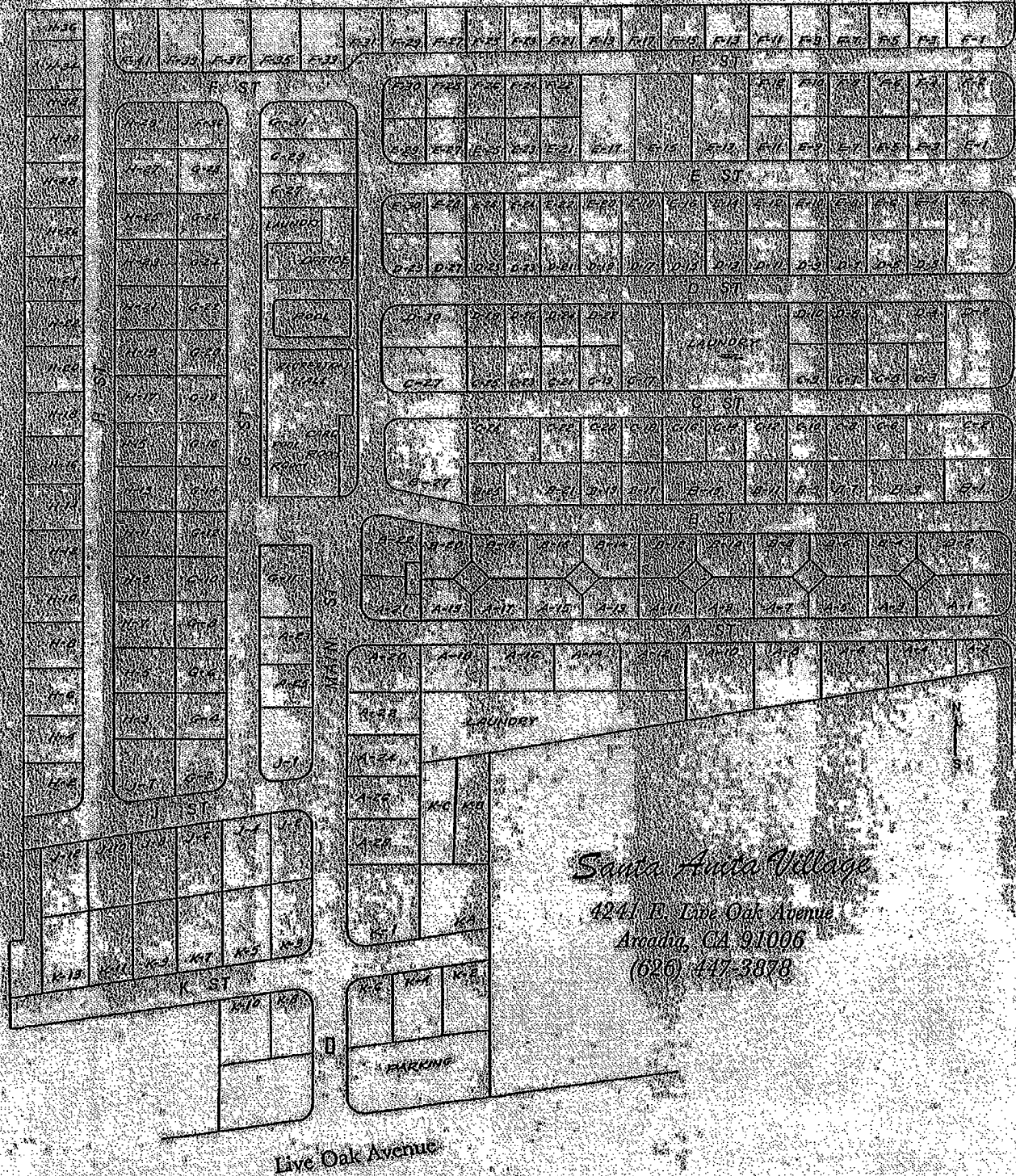


EXHIBIT E
RESIDENT CORRESPONDENCE

Santa Anita Village

4241 E. Live Oak Avenue
Arcadia, CA 91006

March 1, 2004

All Residents and Prospective Residents
Santa Anita Village
4241 E. Live Oak Avenue
Arcadia, CA 91006

Re. Potential Closure of Santa Anita Village

Dear Resident and Prospective Resident:

This letter is to advise you that at some future date, possibly within the next three (3) years, the owner of Santa Anita Village may begin the process of closing the Park. In such event, the Park would be closed in accordance with the provisions of the *Mobilehome Residency Law* (Civil Code § 798 et seq.) and all other applicable law.

In the event the decision is made to close the Park, you will receive advance notice in accordance with the provisions of the *Mobilehome Residency Law* and will be required, upon expiration of the period specified in said notice, to move from the space you occupy and remove your mobilehome or trailer.

This letter is given to you as a courtesy so as to make you aware of the possibility of the Park's closure. This letter is not intended as a notice of closure as required by the *Mobilehome Residency Law*. Please sign this letter in the space indicated to acknowledge that you have read, understood and received a copy of this letter.

If you have any questions regarding the foregoing, please contact on-site Management.

Very truly yours,

Park Management

I have read, understood and received a copy of the foregoing letter.

Dated: _____

Space # _____

Santa Anita Village

4241 E. Live Oak Avenue

Arcadia, CA 91006

(626) 447-3878

Statement Regarding Potential Park Closure

I/We the undersigned, hereby acknowledge that we are applying to rent a mobilehome/trailer unit in Santa Anita Village, and we understand that our relationship with Santa Anita Village, if approved for tenancy, would be that of a "renter" only and not as a "homeowner" as defined by the *California Mobilehome Residency Laws*.

I/We the undersigned, further acknowledge that the owners of Santa Anita Village are planning the redevelopment of Santa Anita Village in the near future, possibly within two years from now. We further understand that when the redevelopment takes place, although we will be given at least sixty (60) days' notice to move from the property, we will not be provided with any assistance or consideration of any nature for the purposes of relocation at the time the park is closed or redeveloped.

Per the above declaration, I/we are willing to enter into a rental agreement with Santa Anita Village for the rental of a mobilehome/trailer unit if our application for tenancy is approved, with the full knowledge that the park will be closing in the near future and that we will not be participating in any relocation program established for the "mobilehome owners" of the park.

Dated: _____

Signature of Applicant

Signature of Applicant

Printed Full Name of Applicant

Printed Full Name of Applicant

Dated: _____

Park Management

EXHIBIT C

SANTA ANITA VILLAGE RESIDENT SURVEY

Santa Anita Village - Resident Census

Space #	# Adults 62 & Over	Occupants	Income Level	MA YR Model	Single Wide	Double Wide	Enclosure	Move-In Date	Space Rent	Tenure at Park
A23	1	2	L	1965		20x56		Jan-91	\$501	16
A26		1	EL	1956	8x44			Nov-96	\$583	14
D2		1	VL	1963	12x55			Sep-01	\$680	9
D8		2	VL	1962	8x40		10x16	Nov-98	\$568	12
E2	2	2		1965		20x53		Mar-97	\$639	13
E13	1	3	VL	1961		12x56	slide out	Oct-98	\$583	12
E17	1	1	L	1964		20x55		Aug-99	\$675	11
F2	2	2	VL	1958		16x30		Dec-81	\$465	29
F5		1	VL	1958	10x40			Mar-96	\$465	14
F12	2	3	L	1957		18x40	slide out	Jul-94	\$552	16
F13		2		1988	8x37		pop out	Mar-82	\$520	28
F25		1		1957	8x32			Jan-90	\$471	20
F31	1	1	VL	1958	10x37		10x10	Jan-91	\$568	19
G11		1	M	1957	12x48			Oct-98	\$588	12
G22	1	1	VL	1969	10x28		add on	Jun-98	\$583	12
H20		2	VL	1970	10x40			May-98	\$583	12
H25	1	1	EL	1964	10x40		slide out	Jul-98	\$583	12
H27		3	VL	1964		20x44		Jun-93	\$583	17
H28		4	L	1970		20x40		Apr-99	\$583	11
H29		4	VL	1967		20x43	expando	Aug-99	\$583	11
J7	1	1	EL	1953	8x44			Nov-89	\$486	21
K1		1	VL	1958		20x45	expando	Oct-02	\$583	8
KB		1	EL	1964	10x48		expando	Aug-90	\$583	20
		2	VL					Sep-04	\$565	6
		1	VL					Apr-05	\$550	5
A20		1	L					Sep-08	\$750	2
		2	AM					Aug-07	\$1,000	3
G26		1	VL					Apr-09	\$700	1
H13		1	L					Nov-09	\$1,000	1
H15		1	VL					Apr-08	\$725	2
G28		1	AM					Jan-09	\$800	1
G29		2	VL					Jul-09	\$800	1
H12	2	2	L					Aug-08	\$800	2
H18		3	L					Aug-09	\$1,000	1
H22		1	L					Nov-06	\$920	4
H34	1	2	L					Feb-08	\$575	2
K45	1	2	VL					Feb-08	\$725	2

17 66

10

Legend:

	owned by resident, owner occupied
	owned by Park, renter occupied
	Park employees

EXHIBIT D

HUD INCOME LIMITS - LOS ANGELES COUNTY

The following figures are approved by the U. S. Department of Housing and Urban Development (H.U.D.) for use in the County of Los Angeles to define and determine housing eligibility by income level.

Area Median: \$62,500					
Family Size	Extremely Low	Very Low	Lower	Median	Moderate
1 Person	16,650	27,750	44,400	48,450	52,150
2 Person	19,050	31,700	50,750	48,700	59,600
3 Person	21,400	35,700	57,100	55,900	67,050
4 Person	23,800	39,650	63,450	62,100	74,500
5 Person	25,700	42,800	68,550	67,050	80,450
6 Person	27,600	46,000	73,600	72,050	86,400
7 Person	29,500	49,150	78,700	77,000	92,400
8 Person	31,400	52,350	83,750	81,950	98,350

Figures are per the Department of Housing and Community Development (California), Division of Housing Policy Development, effective April 2, 2009.

EXHIBIT 4

MOBILE HOME PARKS WITHIN 20 MILES

Mobile Home Parks Within 20 Miles

Address	City	Total Units	Available Spaces	Mobile Home Count	Rent Range	Comments
Plantation Mobile Estates 1896 S. Manchester Ave, Anaheim, CA (714)750-2711	Anaheim, CA	122	0	0	\$950	The Mobile homes that they have available they rent out
La Balle Fontaine Mobile Home Park 200 N. Grand Ave, Anaheim, CA (714)827-2780	Anaheim, CA	101	1	3	\$875	Called they have Mobile Homes for sale, but you have to drive around the park to get info on them. No homes older than 10 years.
Anaheim Shores MH Estates 1919 W. Coronel Ave, Anaheim, CA 92801 (714)774-1060	Anaheim, CA	284	0	13	\$675-\$750	Have both doublewide & triplewide for sale. Need to visit the park, as coaches are sold through Realtors.
Pacific Sunset Mobile Home Estates 2117 S Beach Blvd, Anaheim, CA (714)895-8866	Anaheim, CA	133	2	114W	\$875	Drive park to see what's for sale. New homes only.
Del Este Mobile Estates 1241 N. East St, Anaheim, CA 92803 (714)871-2337	Anaheim, CA	217	0	2	\$880	Need to go around park to get info on for sale homes.
Anaheim Royal Mobile Home Park 1250 N State College Blvd, Anaheim, CA (714)535-2619	Anaheim, CA	109	0	Some	\$800	There are some Mobile Homes for Sale, but you need to drive around the park to get info on them.
Satellite Mobile Home Park 1844 S. Hacer St, Anaheim, CA (714)750-2322	Anaheim, CA	138	0	Maybe 1	\$1,000	Coaches sold by owners, need to drive the park.
Anaheim Mobile Estates 3050 Ball Road, Anaheim, CA (714)828-8820	Anaheim, CA	128	0	10-15	\$950	Need to drive around park to get info on for sale homes.
Del Ray Mobile Home Park 1949 S. Manchester Ave, Anaheim, CA (714)750-2240	Anaheim, CA	114	0	3	\$775	Have to drive around park to get info on Mobile homes for sale.
Palm Lodge MH Estates 2627 E. La Palma Ave, Anaheim, CA 92806 (714)774-9260	Anaheim, CA	182	0	0	\$1195-\$1495	they just rent the homes they don't sale and there is no space rent just rent plus utilities
Friendly Village of Anaheim 5916 E. La Palma Ave, Anaheim, CA (714)970-7875	Anaheim, CA	347	0	3	\$925	3 brand new coaches. Last one being installed next week.
Western Skies MH Estates 2770 W. Lincoln Ave, Anaheim, CA 92801 (714)828-2124	Anaheim, CA	55	5	0	\$1,030	Have 1 new coach arriving next week and Mgmt Co. bringing in 3 or 4 within a month or so. No age requirements on used homes, as long as they look in good condition.
Golden Skies MH Estates 104 W. Midway Dr, Anaheim, CA 92805 (714)778-3000	Anaheim, CA	140	0	16	\$975	Family park, but have to drive around park to get info on for sale homes.
Rio Vista Mobile Estates 520 N. Park Vista St, Anaheim, CA 92806 (714)630-7704	Anaheim, CA	190	0	23	\$1,325	3 coaches for sale that owned by the park. About 20 that are privately owned - drive the park for info.
Walnut Creek Mobile Lodge 1735 Puente Ave, Baldwin Park, CA 91706 (626)574-9288	Baldwin Park, CA	30	0	1	\$875	Presently only 1 for sale by owner
Holiday Lodge Mobile Home Park 661 N. Puente Ave, Baldwin Park, CA 91706 (626)338-2867	Baldwin Park, CA	93	0	4	\$665-\$765	Need to go around park to get info on for sale homes.
Fountain Blue Mobile Home Park 1705 Puente Ave, Baldwin Park, CA 91706 (626)850-2325	Baldwin Park, CA	82	0	3	\$665-\$765	Family park, but have to drive around park to get info on for sale homes.
Ball Mobile Home Park 4874 Gage Ave, Ball, CA 90201 (323)580-1179	Ball, CA	154	0	6	\$695	Drive around park to get info on for sale homes.

Mobile Home Parks Within 20 Miles

Part Name & Address	Location	Sp. Avail.	Sp. for Sale	Mobile Homes for Sale	Sp. for Rent	Comments
Skylark Mobile Home Park 9113 E. Rosegarden Ave. Bellflower, Ca 90709 (662) 633-5049	Bellflower, CA	44	0	2	\$820	There are at least 2 coaches owned by the park for sale. There are others - for sale by owners. Need to drive the park.
Van 3 Mobile Home Park 2805 Van Ness Blvd. Bellflower, Ca 90709 (662) 633-5049	Bellflower, CA					Spoke with the manager and he said he had no coaches for sale.
Van 3 Mobile Home Park 8723 Artesia Blvd. Bellflower, Ca 90709 310 or (662) 633-4224	Bellflower, CA	94	0	1+		1 new coach for sale by park. Others RSBO Drive park.
Rancho Brea Mt Estates 1414 W. Central Ave. Brea, Ca 92621 (562) 697-1402	Brea, CA	100	0	4	\$745	need to drive around park to get info on for sale homes
Harold's Mobile Home Park 10000 E. Central Expressway Orange, Ca 92668 (714) 992-1400	Orange, CA					Nothing available
Van 3 Mobile Home Park 2805 Van Ness Blvd. Bellflower, Ca 90709 (662) 633-5049	Bellflower, CA					Spoke with the manager and he said he had no coaches for sale.
Hollydale MH Estates 5700 Carbon Canyon Rd Brea, Ca 92623 (714) 628-7779	Brea, CA	134	0	3	\$1300-\$1400	need to go into park to get info on for sale homes
Crestmont MH Estates 1051 Sile Dr. Brea, Ca 92621 (714) 629-4131 or 714-442-1022	Brea, CA	280	0	9-16	\$850-995	Just developed a new section. Drive through the park to see what's for sale.
Harold's Mobile Home Park 10000 E. Central Expressway Orange, Ca 92668 (714) 992-1400	Orange, CA					Nothing available
Buena Park Manor 2142 Orangeflora Buena Park, Ca 90621 (714) 622-5127	Buena Park, CA	54	0	6	\$1,075	Each coach is being sold by a different realtor. Most are 3 bdrm.
Rancho Monte Vista 15050 Monte Vista Ave, Chino Hills, Ca 91709 (909) 977-2811	Chino Hills, CA	228	6	Few	\$700-\$1,000	Need to set up appointment and fill out application, then they will give you space rental rates. Need to submit the following info. To Anna Yzaguirre (851) 860-1646, used mobile homes title paper, and pictures for approval.
Lake Los Serranos MHP 16111 Pipeline Ave. Chino Hills, Ca 91709 (909) 627-3614	Chino Hills, CA	300	3	Quite a few	\$775-1,075	Vacant spaces within park are reserved by dealers to bring in new homes only. Drive park to get info on coaches for sale.
Pembroke Downs Mobile Home Park 12400 Cypress Avenue, Chino, Ca 91709 (909) 628-0819	Chino, CA	153	0	4	\$695	Need to drive park for info on coaches for sale.
Lampighter Chino Mobile Home Park 4400 Philadelphia St. Chino, CA 91709 (909) 627-3614	Chino, CA	260	0	0		Nothing presently available within the park, either in spaces or coaches for sale.
Ramona MHP 11908 Ramona Ave. Chino, Ca 91710 (909) 634-0501	Chino, CA	40	0	0	Varies	need to speak to Mark and he was not in to get info on for sale homes you have to drive around park
El Rancho Mobile Home Park 16002 S. Atlantic Ave. Compton, Ca 90015 (310) 832-7556	Compton, CA	162	0	Some	\$570	Drive the park for info about coaches for sale.
Orange Grove Mobile Home Park 19548 E. Cypress St. Covina, Ca 91724 (626) 966-0811	Covina, CA	43	1	1	\$850	Prefer new mobile home or one in very good condition.
Mobile Aire Estates 716 N. Grand Ave. Covina, Ca 91724 (626) 331-2717	Covina, CA	103	0	3	\$850-950	Three coaches sold through the park.
Tumbling Waters Mobile Park 1380 N. Clarks Ave. Covina, Ca 91722 (626) 331-2143	Covina, CA	113	0	0	\$775	Have to drive around park to get info on mobile homes for sale.
Royal Palms Mobile Home Park 21210 E. Arrow Hwy. Covina, Ca 91724 (626) 331-4128	Covina, CA	187	3	12	\$800	Email pictures of the used home at royalpalmsundisseries.com for move in approval.
Starlite Mobile Estates 1045 N. Azusa Ave. Covina, Ca 91722 (626) 331-5927	Covina, CA	245	0	15	\$750-\$950	Need to drive around the park.
Arrow Glen Manor 10850 E. Arrow Hwy. Covina, Ca 91724 (626) 331-2432	Covina, CA	49	0	some	\$750-880	Spoke with temporary Mar. For more accurate info, please call after 2/22/10 & speak with Shirley.
Rancho San Jose 21310 E. Covina Blvd. Covina, Ca 91724 (626) 331-4094	Covina, CA	81	0	1	\$800	need to drive around park to get info on for sale homes
Lincoln Center MHP 9080 Bloomfield St. Cypress, Ca 90630 (714) 531-3784	Cypress, CA	303	0	2	\$1,000-\$1,150	need to drive around park to get info on for sale homes
Orange Grove Trailer Park 1331 Lakewood Blvd. Downey, Ca 90242 (562) 633-0744	Downey, CA	49	0	0	\$400	No spaces available.

Mobile Home Parks Within 20 Miles

Park Name & Address	City	Lot Size	Year Bld	Number of Units	Price	Comments
Keelera Mobile Home Park 669 Random Lane, Duarte, CA 91010 (626) 562-8001	Duarte, CA	6	0	0	\$1,050	they don't have any available spaces and no mobile homes for sale right now
El Monte Mobile Home Park 226 E. El Monte Ave., El Monte, CA 91731 (626) 449-5100	El Monte, CA	10	0	0	\$1,050	they don't have any available spaces and no mobile homes for sale right now
Brookside Mobile Country Club 12700 Elgin Ave., El Monte, CA (626) 449-8727	El Monte, CA	421	00	10	Varies	Need to set up appointment and fill out application, then they will give you space rent. It varies. Need to submit the following info. To Anna Yzaquile (951) 360-1545: used mobile homes, new paint on outside, title, paper, and pictures for approval, also need to show \$ for set up.
Capri Gardens 3641 Baldwin, El Monte, CA 91731 (626) 449-5017	El Monte, CA	67	0	1	\$500	need to set up an appointment to look at the available homes.
El Monte Mobile Home Park 226 E. El Monte Ave., El Monte, CA 91731 (626) 449-5100	El Monte, CA	10	0	0	\$1,050	they don't have any available spaces and no mobile homes for sale right now
Country Place MHP 1899 W. Orange Grove Fullerton, CA 92633 (714) 690-5447	Fullerton, CA	72	1	1	\$775	1 space available for 12x40, 1 home for sale. need title work for \$25,000.00.
Cedarhill Estates 2851 Rolling Hills Dr., Fullerton, CA 92835 (714) 524-5051	Fullerton, CA	281	0	1	own land	need to come into office to get info on sale. homes would not give any info over the phone.
Fullerton Mobile Home Park 2851 Rolling Hills Dr., Fullerton, CA 92835 (714) 524-5051	Fullerton, CA	281	0	1	own land	need to come into office to get info on sale. homes would not give any info over the phone.
Fullerton Mobile Home Park 2851 Rolling Hills Dr., Fullerton, CA 92835 (714) 524-5051	Fullerton, CA	281	0	1	own land	need to come into office to get info on sale. homes would not give any info over the phone.
Bonita Mobile Estates 626 Bonita Avenue, Glendora, CA 91740 (626) 331-5405	Glendora, CA	80	0	4	\$500	need to drive around park to get info on for sale homes.
Arrowhead Mobile Park 201 E Arrow Hwy, Glendora, CA 91740 (626) 963-2295	Glendora, CA	66	0	2	\$625	drive around park to get info on for sale homes.
Glendora Mobile Home Park 201 E Arrow Hwy, Glendora, CA 91740 (626) 963-2295	Glendora, CA	66	0	2	\$625	drive around park to get info on for sale homes.
Wildwood Mobile Country Club 9th Ave, Hacienda Heights, CA 91745 (626) 866-2338	Hacienda Heights, CA	456	6	0	\$850-\$865	Need to drive around park to see homes for sale.
Wildwood Mobile Country Club 9th Ave, Hacienda Heights, CA 91745 (626) 866-2338	Hacienda Heights, CA	456	6	0	\$850-\$865	Need to drive around park to see homes for sale.
Wildwood Mobile Country Club 9th Ave, Hacienda Heights, CA 91745 (626) 866-2338	Hacienda Heights, CA	456	6	0	\$850-\$865	Need to drive around park to see homes for sale.
Rancho La Seda Mobile Home Community 650 La Seda Rd., La Puente, CA 91744 (626) 964-8213	La Puente, CA	104	0	4	\$760	One for Mid \$70,000, 2 bd. For \$35,000, 1 bd. For \$10,000.00.
Copacabana Mobile Home Park 2717 Arrow Hwy, La Verne, CA 91760 (800) 593-2044	La Verne, CA	178	3	7	\$450-\$650	Need to drive around park to get info on for sale homes.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
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King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
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King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
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King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
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King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA	178	0	16	\$699	Need to drive around to get info. On home for sale, park owns a few homes that they can take out if new home is brought in.
King's Way Gardens 2755 Arrow Hwy, La Verne, CA 91760 (800) 593-2200	La Verne, CA					

Mobile Home Parks Within 20 Miles

Facility Name & Address	City/County	Floor Plate Sq Ft	Avg # Units	MOBILITY SALE	Crate Rent	Comments
Hacienda Mobile Home Park Damon Ave., Chico, CA 95926 (909)835-4015	Chico, CA	-	-	0	-	No empty spaces available.
El Monte Mobile Home Community 1700 N. Main Ave., El Monte, CA 91734 (909)895-9375	El Monte, CA	-	-	-	-	No empty spaces available.
Shady Lane Mobile Lodge 4138 Mission Blvd., Montclair, Ca 91763 (909)826-4874	Montclair, CA	75	1	6	\$200-\$310	Need to drive to see homes for sale. Used home needs to be inspected by property management.
Villa Montclair Mobile Home Park 5580 Moreno St., Montclair, Ca 91763 (909)852-2215	Montclair, CA	95	0	Need to drive & See	\$440-\$560	Need to drive around to get info on homes for sale.
Sunset Trailer Grove 4400 Holt Blvd., Montclair, Ca 91763 (909)399-9028	Montclair, CA	97	0	2	\$600	No empty spaces available.
Hacienda Mobile Home Park 4351 E. Mission Blvd., Montclair, Ca 91763 (909)827-0095	Montclair, CA	204	0	15	\$380-\$605	No empty spaces available, need to drive around for sale info.
Monterey Manor MHP 11250 Ramona Ave., Montclair, Ca 91763 (909)823-7615	Montclair, CA	140	0	1	\$550	Only one space for 20 x 35.
Montebello Mobile Home Park 525 S. Greenwood Ave., Montebello, Ca 90840 (323)721-4112	Montebello, CA	48 12(RV)	0	0	\$425 \$325 (RV)	No empty spaces available.
Imperial Village 11101 Imperial Hwy., Norwalk, Ca 90851 (562)884-0044	Norwalk, CA	184	0	9	\$675	Might have empty spaces in the month of March.
Del Cerro Mobile Estates 250 South Rose Dr., Placentia, Ca 92870 (714)924-3122	Placentia, CA	171	0	6	\$775	Need to drive around, for MH sales info.
Piedra Grande Mobile Home Park 1000 Camino Real, Placentia, Ca 92679 (714)924-3122	Placentia, CA	-	-	-	-	No empty spaces.
La Habra Jacaranda Villa Orangeburg Ave., La Habra, Ca 91748 (562)741-1840	La Habra, CA	-	-	-	-	No empty spaces.
Crest Mobile Manor 8727 Equilon Rd., Pomona, Ca 91767 (909)803-9031	Pomona, CA	141	0	4	\$648	1 space for new home, need to get info. On who will be bringing the home in.
Monterey Manor Mobile Home Park 11250 Ramona Ave., Pomona, Ca 91768 (909)826-7816	Pomona, CA	140	0	4	\$800-\$850	Need to drive around, for MH sales info.
Pomona Islander Mobile Home Park 5087 W. Valley Blvd., Pomona, Ca 91765 (909)596-2121	Pomona, CA	229	9	10	\$600	Need to drive around, for MH sales info. Homes need to be inspected by property management.
Thunderbird Trailer Park 1761 E. Mission Blvd., Pomona, Ca 91768 (909)720-4648	Pomona, CA	61	0	1	\$450	1 home for sale double wide \$89,000.00. Space rent starts at \$450.00.
Fourhill Mobile Park 402 E. Fourthill Blvd., Pomona, Ca 91767 (909)621-0627	Pomona, CA	75	0	2	\$650	Need to get home info from owners.
Montclair Mobile Home Park 4161 E. Mission Blvd., Pomona, Ca 91766 (909)720-4649	Pomona, CA	45	0	2	\$550	No vacant spaces.
Hacienda Mobile Home Park 4361 Mission Blvd., Pomona, Ca 91765 (909)627-0086	Pomona, CA	204	0	1	\$800	No vacant spaces.
Trade Winds Mobile Estates 3107 N. San Gabriel Blvd., Rosemead, Ca 91270 (626)573-1920	Rosemead, CA	22	0	2	\$770	1 home for \$70,000, and for \$26,000.00.
Rowland Mobile Home Park 1441 Paso Real Rowland Heights, Ca 91746 (626)984-5916	Rowland Heights, CA	327	0	Few	\$889	Need to drive around, for MH sales info.
Sanoma Holiday Mobile Home Park 10000 Valley Ave., Sanoma, Ca 91767 (909)822-4000	Sanoma, CA	-	-	-	-	Small community, for more info, please call or contact owner for more info.
Sanford Villa Park 11000 Sanford Ave., Sanoma, Ca 91767 (909)822-4000	Sanoma, CA	-	-	-	-	Small community, for more info, please call or contact owner for more info.
Shiloh Mobile Home Park 10000 Shiloh Ave., Shiloh, Ca 91767 (909)822-4000	Shiloh, CA	-	-	-	-	Small community, for more info, please call or contact owner for more info.
Stanton Mobile Home Park 10550 Western Ave., Stanton, Ca 90680 (714)878-4170	Stanton, CA	189	0	10	\$950	Need to drive around, for MH sales info.

Mobile Home Parks Within 20 Miles

Address	City	Units	Family	Senior	Space Rent	Comments
Upland Oaks Mobile Home Park 1050 San Bernardino Ave., Upland, CA 91786 (951) 380-1646	Upland, CA	187	2	0	\$850	Need to call Anna Ziegler @ (951) 380-1646 / Per the assistant the following information has to be submitted to Anna for approval to move used mobile home; will need copy of Title Papers, pictures of mobile home, and bank statements to show there \$15,000.00-\$20,000.00 to move mobile home. Once following information is received and reviewed by Anna, She will contact if mobile home is approved to be moved into desired mobile home park; if not she will provide referrals to other mobile home parks. Mailing Address to submit required info- CMS 6600 Hammer Ave., Mira Loma, CA 91762.
Diamond Bar Mobile Estates 21217 E. Washington Ave., Walnut, CA 91789 (909) 894-6231	Walnut, CA	133	0	0	unknown	No spaces available
Walnut Creek Mobile Estates 20739 Lycoming St., Walnut, CA 91789 (909) 595-2753	Walnut, CA	147	0	8	\$685	Need to drive around, for MH sales info.
Walnut Hills Mobile Home Park 3746 Valley Blvd., Walnut, CA 91789 (909) 598-6112	Walnut, CA	182	0	4	\$775	Need to drive around, for MH sales info.
Mountain View Mobile Estates 2181 W. San Bernardino Rd., West Covina, CA 91760 (626) 962-4707	West Covina, CA	107	0	5	\$795	1 space available, need to drive by to see homes for sale.
Redlands Mobile Home Park 15000 E. 1st St., Redlands, CA 92374 (626) 221-2211	Redlands, CA					No spaces available
Walton Mobile Home Park 15000 E. 1st St., Redlands, CA 92374 (626) 221-2211	Redlands, CA					No spaces available
Walton Mobile Home Park 15000 E. 1st St., Redlands, CA 92374 (626) 221-2211	Redlands, CA					No spaces available

Legend:

	family park
	senior park

EXHIBIT 4

PARKS ACCEPTING USED MOBILE HOMES

Parks With Vacant Spaces Accepting Used Mobile Homes

1	Le Bane Fontaine Mobile Home Park 200 N. Grand Ave. Anaheim, CA 714/927-2750	Anaheim, CA	101	1	3	3875	No	Have Mobile Home for sale, but you have to drive around the park to get into on there. My home older than 10 years can be brought into the park.
2	Western Oaks MH Estates 2770 Wilshire Ave. Anaheim, CA 92801 714/828-2124	Anaheim, CA	55	5	0	33,030	No	Have 1 new coach arriving next week and Mand Co. bringing in 3 or 4 within a month or so. No age requirements on used homes, as long as they look in good condition.
3	Banting Mobile Villa 16050 Monte Vista Ave. Chino Hills, CA 909-597-2211	Chino Hills, CA	228	8	6000	3700-31,000	Yes	Need to drive the park for sale info sent by coach. Owners/real estate agents. Need to call Anna Yzaguirre @ (951) 360-1646 / For the assistant the following information has to be submitted to Anna for approval to move used mobile home: will need copy of Title Papers, pictures of mobile home, and bank statements to show how \$15,000-\$20,000 to move mobile home. Once following information is received and reviewed by Anna, she will contact if mobile home is approved to be moved into desired mobile home park. If not she can provide referrals to other mobile home parks. Mailing Address to submit required info: CMS 5600 Hammer Ave., Mira Loma, CA 91762
4	Orange Grove Mobile Home Park 10548 E. Cypress St. Covina, CA 91724 (920)954-2611	Covina, CA	43	1	3	1650	No	Prior new mobile home or one in very good condition.
5	Royal Palms Mobile Home Park 91210 E. Arroyo Hwy. Covina, CA 91724 (620)521-1618	Covina, CA	167	3	12	3000	No	Email pictures of the used home at: throyalpalms@earthlink.net for move in approval.
6	Crown Mobile Home Park 10548 E. Cypress St. Covina, CA 91724 (920)954-2611	Covina, CA	43	1	3	1650	No	Prior new mobile home or one in very good condition.
7	Brentwood Mobile Country Club 12700 Elton Ave. El Monte, CA 91734 (920)440-4727	El Monte, CA	121	20	2	11,000	No	Need to call Anna Yzaguirre @ (951) 360-1646. For the assistant the following information has to be submitted to Anna for approval to move used mobile home: will need copy of Title Papers, pictures of mobile home, and bank statements to show how \$15,000-\$20,000 to move mobile home. Once following information is received and reviewed by Anna, she will contact if mobile home is approved to be moved into desired mobile home park. If not she can provide referrals to other mobile home parks. Mailing Address to submit required info: CMS 5600 Hammer Ave., Mira Loma, CA 91762
8	County Pines MHP 1650 W. Chino Blvd. Fullerton, CA 92633 (714)550-5447	Fullerton, CA	72	1	1	5775	No	1 space available for 12x40, no age requirements. Home for sale need new work for \$25,000.
9	Shady Lane Mobile Lodge 4134 Mission Blvd. Montclair, CA 91763 (909)228-4574	Montclair, CA	75	1	10	3200-3210	Yes	Vacant space available for Travel Trailer for sale by owners. Since rent does not include utilities, used homes considered subject to inspection and approval by management.
10	Pomona Islands Mobile Home Park 5087 W. Valley Road, Pomona, CA 91768 (909)535-4181	Pomona, CA	228	5	10	3600	Yes	Need to drive by the park for owners MHP info. Few empty spaces available subject to inspection and approval by management.
11	Upland Chateau MHP 1359 East Bernardino Ave. Upland, CA 91786 (951)320-1646	Upland, CA	187	2	5	3250	Yes	Need to drive the park for sale info sent by coach. Owners/real estate agents. Need to call Anna Yzaguirre @ (951) 360-1646 / For the assistant the following information has to be submitted to Anna for approval to move used mobile home: will need copy of Title Papers, pictures of mobile home, and bank statements to show how \$15,000-\$20,000 to move mobile home. Once following information is received and reviewed by Anna, she will contact if mobile home is approved to be moved into desired mobile home park. If not she can provide referrals to other mobile home parks. Mailing Address to submit required info: CMS 5600 Hammer Ave., Mira Loma, CA 91762
Total			659	29	20			

EXHIBIT C

MOBILE HOME STORAGE

Mobile Homes for Sale

No	Address	City	Price	Beds	Bath	Sq Ft
1	12700 Elliott Ave 84	El Monte	\$8,000	2	2	960
2	1630 S Barranca Ave 26	Glendora	\$13,000	2	1	
3	12700 Elliott 273	El Monte	\$14,944	3	1	
4	1360 N Citrus 016	Covina	\$16,990	2	1	
5	1020 Bradbourne 51	Duarte	\$20,000	2	2	1,040
6	201 E Arrow Hwy 3	Glendora	\$20,000	2	1	
7	21210 E Arrow Hwy 89	Covina	\$20,500	2	1	672
8	1246 W Glenega Blvd 150	San Dimas	\$21,000	2	2	
9	630 South Maple Avenue 19	Montebello	\$22,900	1	1	628
10	12700 Elliott Ave 221	El Monte	\$24,000	2	2	1,440
11	12700 Elliott Ave 165	El Monte	\$24,000	3	2	
12	1020 Bradbourne 85	Duarte	\$25,000	2	1	
13	21210 E Arrow Hwy 18	Covina	\$25,000	2	2	1,040
14	21210 E Arrow Hwy 152	Covina	\$25,000	2	2	1,140
15	1630 S Barranca Ave 163	Glendora	\$25,000	2	2	800
16	1020 S Mountain Ave 23	Monrovia	\$27,500	2	1	960
17	21210 E Arrow Hwy 142	Covina	\$28,500	2	2	1,060
18	12700 Elliott Avenue 95	El Monte	\$29,000	3	2	1,152
19	1246 W Glenega Ave 188	San Dimas	\$30,000	2	2	
20	1630 S Barranca Ave 84	Glendora	\$30,000	2	2	1,200
21	3620 Moreno Ave 3	La Verne	\$30,000	2	2	960
22	630 South Maple Avenue 13	Montebello	\$30,000	2	2	600
23	6530 Damien 248	La Verne	\$31,900	2	2	1,120
24	12700 Elliott 367	El Monte	\$32,000	2	2	
25	801 W Covina Blvd 130	San Dimas	\$32,000	2	1	
26	1765 N Puente 15	Baldwin Park	\$33,500	2	1	
27	10484 Valley Blvd 4	El Monte	\$34,900	2	1	
28	2717 Arrow Hwy 67	La Verne	\$35,000	3	2	
29	840 E Foothill Blvd 60	Azusa	\$35,000	2	1	880
30	201 E Arrow Highway 83	Glendora	\$35,000	2	2	1,060
31	716 North Grand Avenue 88	Covina	\$35,000	3	1	780
32	12700 Elliott Ave 73	El Monte	\$36,000	3	2	0
33	2717 Arrow Hwy 2	La Verne	\$38,000	2	2	1,056
34	1930 South Barranca 24	Glendora	\$39,500	2	2	1,200
35	716 N Grand Ave G-1	Covina	\$39,900	2	1	
36	3745 Valley Blvd 139	Walnut	\$39,990	3	2	1,440
37	1630 S Barranca 40	Glendora	\$40,000	2	2	1,368
38	3530 Damien 90	La Verne	\$42,000	2	2	
39	1246 W Glenega 79	San Dimas	\$43,000	2	2	
40	208 S Barranca Ave 59	Glendora	\$45,000	2	1	800
41	17360 E Temple Ave 304	La Puente	\$45,000	3	2	1,440
42	1035 E Huntington Dr 54	Monrovia	\$45,000	1	1	960
43	17360 E Temple Ave 217	La Puente	\$45,000	3	2	1,440
44	346 N Sunset Ave 168	La Puente	\$45,000	1	1	
45	1045 N Azusa Ave 230	Covina	\$45,000	2	2	
46	4900 North Daleview Ave 68	El Monte	\$45,000	2	2	1,120
47	3107 San Gabriel Blvd 21	Rosemead	\$46,888	2	1	
48	19860 E Arrow Hwy E12	Covina	\$47,000	3	2	

Mobile Homes for Sale

No	Address	City	Price	Beds	Bath	Sq Ft
49	17350 E Temple Ave 158	La Puente	\$48,000	2	2	1,440
50	17350 E Temple Ave 67	La Puente	\$49,000	2	2	1,440
51	2131 W San Bernardino Rd 37	West Covina	\$49,000	2	2	1,040
52	17350 Temple Ave 476	La Puente	\$49,000	2	2	1,244
53	17350 Temple Ave 139	La Puente	\$49,900	2	2	1,000
54	1045 N Azusa Ave 251	Covina	\$49,900	2	2	800
55	208 S Barranca Ave 56	Glendora	\$49,999	2	2	1,320
56	1045 N Azusa Ave 64	Covina	\$50,000	3	1	960
57	17350 E Temple Ave 89	La Puente	\$52,000	3	2	1,071
58	17350 E Temple Ave 485	La Puente	\$52,000	2	2	
59	21210 E Arrow Hwy 119	Covina	\$52,000	3	2	1,120
60	17350 E Temple Ave 181	La Puente	\$52,500	2	2	1,296
61	1045 N Azusa Ave 143	Covina	\$53,000	3	2	1,012
62	1635 W Covina Blvd 83	San Dimas	\$53,900	2	2	1,000
63	208 S Barranca Ave 44	Glendora	\$54,700	2	2	1,440
64	4096 Fruit St 159	La Verne	\$54,900	2	2	1,440
65	21210 E Arrow Hwy 107	Covina	\$56,900	3	2	1,040
66	21310 E Covina Blvd 50	Covina	\$57,000	2	2	1,248
67	1630 S Barranca Ave 60	Glendora	\$57,000	2	2	1,296
68	2765 Arrow Hwy 111	La Verne	\$57,900	2	2	
69	17350 Temple Ave 365	La Puente	\$59,000	2	2	1,440
70	3033 Valley Blvd 84	West Covina	\$59,000	3	2	1,440
71	17350 E Temple Ave 48	La Puente	\$59,000	2	2	1,440
72	1630 W Covina Blvd 23	San Dimas	\$59,000	3	2	1,237
73	21010 E Arrow Hwy 4	Covina	\$59,000	3	2	1,200
74	17350 East Temple Ave 468	La Puente	\$59,000	3	2	1,296
75	17350 East Temple Ave 43	La Puente	\$59,000	3	2	1,248
76	830 South Azusa Avenue 11	Azusa	\$59,000	2	2	880
77	925 W Bonita 41	Glendora	\$59,500	2	2	800
78	21217 E Washington St 97	Walnut	\$59,800	2	2	1,440
79	650 La Seda Rd 3b	La Puente	\$59,900	2	2	
80	1630 W Covina Blvd 28	San Dimas	\$59,900	2	2	1,152
81	4096 Fruit St 114	La Verne	\$59,900	2	2	1,344
82	20739 Lycoming St 47	Walnut	\$59,900	3	2	1,344
83	201 E Arrow Hwy 74	Glendora	\$59,900	3	2	1,248
84	4849 Peck Rd 73	El Monte	\$60,000	2	2	1,440
85	19850 E Arrow Hwy F2	Covina	\$60,000	3	2	
86	3945 Bradford St 21	La Verne	\$60,000	2	2	1,440
87	4095 Fruit 930	La Verne	\$62,000	2	2	1,440
88	17350 E Temple Ave 77	La Puente	\$64,900	2	2	1,440
89	1630 W Covina Blvd 95	San Dimas	\$64,900	3	2	1,221
90	201 E Arrow Hwy 48	Glendora	\$66,000	2	2	1,104
91	201 E Arrow Hwy 35	Glendora	\$68,000	3	2	1,248
92	1045 N Azusa 58	Covina	\$69,000	3	2	1,019
93	17350 E Temple Ave 312	La Puente	\$69,000	2	2	1,440
94	201 W Arrow Hwy 66	Glendora	\$69,000	2	2	
95	1205 W Cypress Ave 238	San Dimas	\$69,900	3	2	1,248
96	17350 E Temple Ave 239	La Puente	\$72,000	3	2	1,536

2 of 3

Mobile Homes for Sale

No	Address	City	Price	Beds	Bath	Sq Ft
97	17350 E Temple Ave 155	La Puente	\$72,000	2	2	1,440
98	1245 W Glenaga 229	San Dimas	\$74,500	2	2	
99	21210 E Arrow Hwy 40	Covina	\$75,000	3	2	
100	3033 Valley Blvd 74	West Covina	\$76,000	2	2	1,344
101	1045 N Azusa Ave 151	Covina	\$79,000	3	2	1,040
102	1205 Cypress St 94	San Dimas	\$79,000	2	2	1,536
103	3530 Damien 290	La Verne	\$82,500	2	2	
104	1205 W Cypress 17	San Dimas	\$84,000	3	2	1,334
105	17350 E Temple Ave 98	La Puente	\$84,900	3	2	1,500
106	17350 E Temple Ave 171	La Puente	\$85,000	3	2	
107	1380 N Citrus Ave C3	Covina	\$85,000	3	2	960
108	21217 Washington Ave 36	Walnut	\$85,000	2	2	
109	850 S La Seda Rd 10	La Puente	\$85,000	3	2	
110	3830 Damien Ave 288	La Verne	\$87,500	2	2	1,700
111	17350 E Temple Ave 453	La Puente	\$88,000	3	2	1,120
112	3800 Bradford St 302	La Verne	\$88,900	2	2	1,382
113	1735 Puente Ave 16	Baldwin Park	\$90,000	3	2	1,200
114	21210 E Arrow Hwy 8	Covina	\$92,000	3	2	1,100
115	21210 E Arrow Hwy 108	Covina	\$92,000	2	2	1,040
116	3745 Valley Blvd 178	Walnut	\$95,000	3	2	1,904
117	17350 E Temple Ave 51	La Puente	\$97,500	3	2	1,248
118	3800 Bradford St 22	La Verne	\$99,900	2	2	2,176
119	3033 Valley Blvd 123	West Covina	\$99,999	3	2	1,680
120	1245 West Glenaga Ave 140	San Dimas	\$100,000	2	2	1,440
121	1635 W Covina Blvd 34	San Dimas	\$105,000	3	2	1,248
122	21210 E Arrow Hwy 30	Covina	\$108,000	3	2	1,200
123	17350 E Temple Ave 279	La Puente	\$110,000	3	2	1,440
124	21210 East Arrow Hwy 84	Covina	\$119,000	3	2	1,136
125	1245 W Glenaga Ave 120	San Dimas	\$124,000	2	2	1,680
126	3800 Bradford St 42	La Verne	\$130,000	3	3	1,440
127	17350 East Temple Ave 400	La Puente	\$139,900	3	2	1,620

EXHIBIT 11C

CONDOMINIUM UNITS FOR SALE

Condominiums for Sale

No.	Address	City	Price	Beds	Bath	Sq Ft
1	1025 West Huntington Drive E	Arcadia	\$149,000	2	3	1,179
2	912 Gilman Ln 30	Duarte	\$159,900	2	1	895
3	2660 Lake Ave 2	Alladena	\$199,000	1	1	591
4	343 West Central Avenue A	Monrovia	\$209,900	2	2	1,013
5	846 Cinnamon Ln	Duarte	\$227,000	2	2	993
6	1304 Mountain Avenue 201	Duarte	\$229,900	2	2	984
7	315 S Almansor St 6	Alhambra	\$245,000	1	1	755
8	1830 Huntington Drive 14	Duarte	\$250,000	2	3	1,060
9	999 E Valley Blvd	Alhambra	\$256,000	1	1	894
10	5536 Wetland Ave 9	Temple City	\$259,000	2	1	880
11	2980 Lake Ave 7	Alladena	\$269,000	1	1	788
12	874 Cinnamon Ln 62	Duarte	\$275,000	2	1	895
13	210 N Atlantic Blvd C	Alhambra	\$285,000	3	2	1,212
14	5632 N Gladys Ave D	San Gabriel	\$288,000	2	2	772
15	580 W Main St 218	Alhambra	\$289,000	2	2	737
16	2422 Birch St C	Alhambra	\$300,900	3	3	1,386
17	752 West Foothill Boulevard	Monrovia	\$310,000	2	2	1,174
18	330 North Chapel Avenue 215	Alhambra	\$310,000	2	2	919
19	521 W Duarte Dr C	Monrovia	\$315,000	3	3	1,236
20	1122 W Huntington Dr 5	Arcadia	\$319,000	2	2	909
21	112 N Atlantic Blvd A	Alhambra	\$324,000	2	2	1,005
22	1330 S Mayflower Ave L	Monrovia	\$326,500	2	3	1,022
23	1621 S 3rd St 3	Alhambra	\$329,000	2	2	980
24	333 W Duarte Rd B	Monrovia	\$330,000	2	1	1,085
25	826 S 6th St 7	Alhambra	\$330,000	4	3	1,185
26	117 W Marshall St D	San Gabriel	\$335,000	2	2	917
27	580 W Main St 316	Alhambra	\$338,000	2	2	809
28	846 E Foothill Blvd J	Monrovia	\$339,000	2	2	1,117
29	551 Linwood Ave E	Monrovia	\$339,900	2	2	1,385
30	904 Swiss Trails	Duarte	\$340,000	2	3	1,440
31	210 E Walnut Ave A	Monrovia	\$349,000	0	3	1,407
32	109 N 4th St 309	Alhambra	\$349,000	2	2	984
33	749 W Camino Real Ave A	Arcadia	\$349,000	3	3	1,478
34	1124 West Huntington Drive 2	Arcadia	\$350,000	3	2	1,236
35	1020 S Menlo Ave 3	Alhambra	\$355,000	4	3	1,280
36	1128 W Duarte Rd Q	Arcadia	\$356,000	2	2	1,090
37	777 E Valley Blvd 125	Alhambra	\$358,000	2	2	1,100
38	430 Fairview Ave 12	Arcadia	\$358,000	2	2	1,253
39	21 Palmetto Dr E	Alhambra	\$360,000	3	3	1,200
40	200 N 5th St 109	Alhambra	\$360,000	2	2	1,022
41	582 W Huntington Dr L	Arcadia	\$369,000	2	2	1,077
42	1622 S Baldwin Ave 14	Arcadia	\$375,000	2	3	1,097
43	129 S Marguerita Ave 6	Alhambra	\$375,000	3	3	1,359
44	88 E Bay State St 38	Alhambra	\$375,000	2	3	1,570
45	812 S Stoneman Ave F	Alhambra	\$378,000	3	3	1,420
46	589 W Duarte Rd 30	Arcadia	\$379,000	2	2	1,193
47	105 N Chapel Ave 14	Alhambra	\$388,000	3	3	1,592
48	139 Alta St B	Arcadia	\$389,000	2	3	1,009
49	1522 S Baldwin Ave 17	Arcadia	\$390,000	2	3	1,074
50	131 S Atlantic Blvd C	Alhambra	\$390,000	3	3	1,211
51	907 W Mission Rd A	Alhambra	\$395,000	3	3	1,213
52	611 E Live Oak Ave 13	Arcadia	\$395,000	2	3	1,307
53	1128 Duarte Road J	Arcadia	\$395,000	2	2	1,320
54	525 W Duarte Rd I	Arcadia	\$398,000	2	2	1,191
55	999 Ocean View Ave B	Monrovia	\$398,000	3	3	1,601
56	2411 S Baldwin Ave D	Arcadia	\$398,000	2	3	1,081
57	218 N Marguerita Ave B	Alhambra	\$398,000	3	3	1,464
58	100 N Electric Ave 14	Alhambra	\$398,000	2	3	1,264
59	400 S Garfield Ave I	Alhambra	\$398,000	3	3	1,572
60	445 W Duarte Rd 1	Arcadia	\$399,000	2	2	1,084
61	712 S Sierra Vista Ave A	Alhambra	\$399,990	3	3	1,321
62	25 N 4th St D	Alhambra	\$408,000	3	3	1,424

Condominiums for Sale

No.	Address	City	Price	Beds	Bath	Sq. Ft.
93	1231 S Golden West Ave 3D	Arcadia	\$418,000	2	2	1,063
94	756 Shultsview Rd 2	Arcadia	\$419,000	2	2	1,200
95	211 E Commonwealth Ave	Alhambra	\$425,000	3	3	1,367
96	215 E Commonwealth Ave D	Alhambra	\$426,000	3	3	1,367
97	9606 Loridan Ave	Temple City	\$438,000	2	2	1,220
98	431 E Mission Rd 31	Alhambra	\$438,000	2	3	1,540
99	810 S Canyon Blvd E	Monrovia	\$438,000	3	3	1,652
100	78 E Bay State St 1B	Alhambra	\$445,000	2	3	1,650
101	1308 Stevens Ave G	San Gabriel	\$445,000	3	3	1,332
102	1308 Stevens Ave G	San Gabriel	\$445,000	3	3	1,334
103	1708 S 6th St 8	Alhambra	\$448,000	3	3	1,465
104	1102 Fairview Ave D	Arcadia	\$449,000	3	2	1,573
105	903 W Mission Rd B	Alhambra	\$449,000	2	3	1,422
106	88 E Bay State St 1d	Alhambra	\$449,800	2	3	1,050
107	6239 Village Circle	Temple City	\$454,000	3	3	1,420
108	225 S Olive Ave A219	Alhambra	\$458,000	3	2	1,200
109	5236 Rosemead Blvd C	San Gabriel	\$458,000	4	3	1,766
110	1140 E Arcadia Ave 000E	Arcadia	\$467,000	2	3	1,390
111	659 Fairview Ave 4	Arcadia	\$468,000	2	3	1,320
112	1102 La Cadena Ave 5	Arcadia	\$468,000	2-3	3	1,599
113	9407 Duarte Rd 1/2	San Gabriel	\$468,000	2	3	1,413
114	309 S Arroyo Dr D	San Gabriel	\$473,000	3	3	1,495
115	1136 Arcadia Ave F	Arcadia	\$475,000	3	3	1,623
116	121 S Walnut Grove	San Gabriel	\$485,000	3	3	1,640
117	5241 Rosemead Blvd B	San Gabriel	\$489,500	3	3	1,766
118	205 N Palm Ave A	Alhambra	\$490,000	3	3	1,650
119	1820 8th St 19	Monrovia	\$490,000	3	3	1,632
120	45 Alice St H	Arcadia	\$498,000	2	3	1,475
121	9012 E Fairview Ave D	San Gabriel	\$499,000	3	3	1,376
122	505 E Lila Oak St F	San Gabriel	\$499,000	4	3	1,316
123	1504 South Palm Avenue	Alhambra	\$515,000	2	1	1,284
124	928 Arcadia Ave 107	Arcadia	\$518,000	2	3	1,180
125	9012 E Fairview Ave A	San Gabriel	\$528,000	3	3	1,408
126	245 S Pine St F	San Gabriel	\$629,000	3	4	1,880
127	6039 Rillito Ave	Temple City	\$538,000	3	3	1,526
128	89 E Commonwealth Ave 1M	Alhambra	\$540,000	3	3	2,000
129	503 W Duarte Rd 3	Arcadia	\$548,888	2	3	2,065
130	447 Fairview Ave 3	Arcadia	\$549,000	3	3	1,838
131	1980 New Ave B	San Gabriel	\$559,800	3	3	2,113
132	66 E Bay State St 1C	Alhambra	\$570,000	3	3	2,040
133	878 Fairview Avenue F	Arcadia	\$575,000	3	3	1,999
134	150 Diamond St D	Arcadia	\$585,000	4	3	1,983
135	247 S Arroyo Dr 4	San Gabriel	\$598,000	3	4	2,231
136	4825 Arden	Temple City	\$598,000	4	3	1,579
137	4827 Arden	Temple City	\$598,000	4	3	1,579
138	4829 Arden	Temple City	\$598,000	4	3	1,579
139	126 Fano St B	Arcadia	\$598,000	3	3	1,429
140	32 Diamond St D	Arcadia	\$598,888	4	3	2,044
141	101 Esperanza Ave B	Sierra Madre	\$599,000	3	3	1,787
142	1115 Arcadia Ave D	Arcadia	\$599,000	3	3	1,981
143	166 California St D	Arcadia	\$599,800	4	3	2,048
144	1014 Fairview Ave 7	Arcadia	\$618,000	2	3	2,333
145	5328 McCulloch Ave B	Temple City	\$628,000	3	3	1,704
146	5328 McCulloch Ave C	Temple City	\$628,000	3	3	1,704
147	5328 McCulloch Ave D	Temple City	\$628,000	3	3	1,704
148	5328 McCulloch Ave E	Temple City	\$628,000	3	3	1,704
149	5328 McCulloch Ave A	Temple City	\$628,000	3	3	1,768
150	5312 McCulloch Ave	Temple City	\$639,000	4	3	2,360
151	1008 Arcadia Ave D	Arcadia	\$659,000	3	3	2,091
152	6169 Temple City Blvd	Temple City	\$668,000	4	4	2,020
153	140 Genoa St	Arcadia	\$698,000	3	3	1,568
154	152 El Dorado St B	Arcadia	\$698,000	3	3	1,505

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Condominiums for Sale

No.	Address	City	Price	Beds	Bath	Sq Ft
125	331 Diamond St B	Arcadia	\$698,000	3	3	1,997
126	188 El Dorado St A	Arcadia	\$709,000	3	3	1,460
127	19 Genoa St B	Arcadia	\$738,000	3	4	1,643
128	67 Alice St C	Arcadia	\$738,000	3	3	2,014
129	89 E Colorado Blvd S	Arcadia	\$750,000	3	3	2,129
130	527 S 6th Ave C	Arcadia	\$798,000	3	3	2,200

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EXHIBIT 1

COUNTY OF LOS ANGELES FINELTS SUMMARY

Los Angeles County Code Title 8, Chapter 8.57.300
Mobilehome Impact Report - Summary of Relocation Benefits
CPI Increase by 59.7% as of December 2009 from January 1991

Category	Benefit	Potential Supplemental Benefits
Basic Flat Fee	\$9,580 + \$3,195 Doublewide unit move within 50 miles + \$6,390 Triplewide unit move within 50 miles + \$3,995 Move over 50 miles + \$800 Disabled Resident + \$960 Qualified Resident* + \$2,875 Qualified Resident* Move to Conv. Housing	
Exception A (Unit under 320 sq. ft.)	\$3,355 + \$1,120 Move 20 to 50 miles + \$2,395 Move over 50 miles + \$800 Disabled Resident + \$640 Qualified Resident* + \$5,270 Move to Conv. Housing if unit cannot move	
Exception B (Original purchase price \$43,120 to \$95,820 with outstanding mortgage)	Up to \$25,555	Includes up to \$15,970 for outstanding mortgage, plus basic benefit, plus any qualifying Supplemental Benefits
Exception C (Original purchase price over \$95,820 with outstanding mortgage and cannot move within 50 miles)	TBD	Includes any qualifying Supplemental Benefits and the greater of 1) \$11,980 plus Basic Benefit plus up to \$15,970 for outstanding mortgage, or 2) 60% of the difference between on-site and off-site value
Other	\$1,600 \$1,600 \$2,075 \$0.00	Recreational Vehicle (Motorhome, Camper, Fifth Wheel) Renter Minimum payment if Benefits waived for a Mobilehome Owner Minimum payment if Benefits waived for Tenant

Notes:

- Qualified Resident may waive Option to Elect Move to Conventional Housing
- The increase from 1991 was calculated based on the US Department of Labor-Bureau of Labor Statistics Los Angeles-Riverside-Orange County, CA Consumer Price Index - All Urban Consumers - All Items, Jan 1991 = 140.0, Dec 2009 = 223.643, CPI Increase = 59.7%

*** Qualified Resident**

- (a) Very Low Income; or
- (b) Low Income Senior Citizen (62); or
- (c) Low Income and Disabled per Federal Regulations

EXHIBIT J

SUMMARY BENEFIT WORKSHEET

SUMMARY BENEFIT WORKSHEET

Name: _____
 Address: _____
 Space #: _____

Benefit Category	Amount	Y/N	Benefit
Basic & Supplemental Benefits			
Basic Flat Fee	\$9,580.00		
Doublewide move within 50 miles	\$3,195.00		
Triplewide move within 50 miles	\$6,390.00		
Move over 50 miles	\$3,995.00		
Disabled Resident	\$800.00		
Qualified Resident*	\$960.00		
Qualified Resident* Move to Conv. Housing	\$2,875.00		
Exception A (Unit <320 s.f.)			
Move 20 to 50 Miles	\$3,355.00		
Move over 50 miles	\$1,120.00		
Disabled Resident	\$2,395.00		
Qualified Resident*	\$800.00		
Move to Conv. Housing if unit cannot move	\$640.00		
Exception B (Original purchase price \$43,120 to \$95,820 with outstanding mortgage and cannot move within 50 miles)			
	See Notes		
Exception C (Original purchase price over \$95,820 with outstanding mortgage and cannot move within 50 miles)			
	See Notes		
Other			
Recreational Vehicle	\$1,600.00		
Renter	\$1,600.00		
Benefits waived if mobilehome owner	\$2,075.00		
Benefits waived if tenant	\$0.00		
Total Summary Benefit			\$0.00
Notes:			

*Qualified Resident

- (a) Very Low Income; or
- (b) Low Income Senior Citizen (62); or
- (c) Low Income and Disabled per Federal Regs.

Agreed: _____

Approved: _____

Epic Land Solutions, Inc.

2601 Airport Drive, Suite 115
Torrance, CA 90505

Phone: 310-626-4848
Fax: 310-891-3348

Monday, October 04, 2010

Los Angeles County Department of Regional Planning
320 West Temple Street 13th Floor
Los Angeles, CA 90012
Attention: Jodie Sackett

RE: Review Report- Santa Anita Village Mobilehome Park Closure Impact Report Project
Project: TRO68400-5 Mobilehome Permit No. 201000003
Project Address: 4241 East Live Oak Avenue Arcadia, CA

Dear Los Angeles County Department of Regional Planning:

This Review Report of the Santa Anita Village Mobilehome Park ("Park") Closure Impact Report ("Report") prepared by Overland, Pacific and Cutler (OPC) is intended for Prime Enterprises, LLC, to fulfill its due diligence requirement that is required by the Los Angeles County Code Chapter 8.57 and the state Mobilehome relocation throughout Southern California. Epic is familiar with regulations and guidelines governing the relocation process.

Epic has reviewed the Santa Anita Village Mobilehome Park Closure Impact Report thoroughly, paying close attention to compliance with Chapter 8.57 and State Mobilehome Residency Law.

Additional fact checking was performed for verification of pertinent information contained in the Closure Impact Report in relation to the compliance with applicable regulations, letters and maps and available resources. Below are the findings and recommendations.

Compliance with Applicable Regulations:

The Closure Impact Report which is the subject of this Review has been found to be compliance with the governing regulations. Although not specifically outlined in the Mobilehome Residency Law or County Code 8.57, Epic suggests that the following will enhance the Report and make the relocation activities as smooth as possible:

Creating Land Solutions for the Public Good
www.epicland.com

October 4, 2010

Page 2

- The Report did not include photographs of the 37 coaches that are being affected by the closure. These photos can help document the condition of the coaches before closure.
- The Report did not mention availability of temporary housing for those households which may have a more difficult time finding a replacement. Related to the fact that the Report stated that some park residents could face special challenges finding a replacement due to age of the coaches and finances, health and age of the occupants.

Verification of Maps, Relocation Benefits and Letters Presented in the Report:

Epic has reviewed the letters, maps and relocation benefits that were used in the Report as its exhibits. They all appeared to be adequate and seem to provide the sufficient information pursuant to the governing regulations.

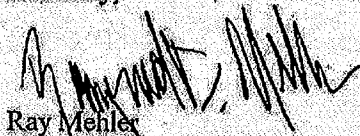
Available Resources

Epic has reviewed the available data which was used as the basis for the Report. The available resource section of the Report appears to meet all the requirements. However, as noted above, it is recommended that this section of the Report be amended to include available resources for the households which might require temporary displacement in order to meet project schedule.

Conclusion

Epic affirms that this Report complies with County Code Chapter 8.57 and the state Mobilehome Residency Law. Epic's suggestions to add photos of the coaches involved in the relocation and include resources for temporary housing are merely suggestions to enhance the Report and are not required for compliance with the County and State regulations. Overall, the Report was well structured and informative.

Sincerely,



Ray Mehler
Regional Manager

Cc: Steve Zuckerman

www.epicland.com

RIGHT OF WAY SOLUTIONS FOR THE PUBLIC GOOD

Epic Land Solutions, Inc.

2601 Airport Drive, Suite 115
Torrance, CA 90505

Phone: 310-626-4848

Fax: 310-891-3348

Closure Impact Report Review Checklist

Project Name:	Santa Anita Village Mobilehome Park
Closure Impact Report Preparer:	Overland, Pacific & Cutler
Reviewed By:	Epic Land Solutions, Inc. - Kathy Cabanilla
Reviewed For:	Prime Enterprises, LLC

Required Information	Compliant	Action Suggested	Action Recommended (but not required)
Introduction	<input checked="" type="checkbox"/>		
Project Area Location	<input checked="" type="checkbox"/>		
Property Description	<input checked="" type="checkbox"/>		
Project Site Photos	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Photos of coaches that have to be relocated.
Relocation Resources	<input checked="" type="checkbox"/>		
Methodology	<input checked="" type="checkbox"/>		
Survey Results	<input checked="" type="checkbox"/>		
Relocation Costs	<input checked="" type="checkbox"/>		
Closure Impacts	<input checked="" type="checkbox"/>		
Proposed Mitigation Measures	<input checked="" type="checkbox"/>		
Park Closure	<input checked="" type="checkbox"/>		
Temporary Housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Possible temporary housing.

The photos and temporary housing information may be provided in a separate supplement to the report and notices may be delivered to residents prior or as part of the state required 6 Month Notice of Closure.